



County of San Diego

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May 27, 2021

CEQA Initial Study - Environmental Checklist Form (Based on the State CEQA Guidelines, Appendix G)

1. Title; Project Numbers; Environmental Log Number:

Moosa Creek Restoration Project; PDS2021-LDGRMJ-30327;
PDS2021-ER-02-002

2. Lead agency name and address:

County of San Diego, Planning & Development Services
5510 Overland Avenue, Suite 110
San Diego, CA 92123-1239

3. a. Contact: Jenna Roady, Environmental Coordinator
b. Phone number: 858-495-5437
c. E-mail: jenna.roady@sdcounty.ca.gov

4. Project Location:
Camino Del Rey/Old River Road
Thomas Guide Pages 1068 A-1 and 1068 A-2

5. Project applicant name and address:

Paul Sherman
Burns & McDonnell Engineering Company, Inc.
4224 Executive Square, Suite 500
La Jolla, CA 92037

6. General Plan
Community Plan: Bonsall
Regional Category: Rural/Semi-Rural
Land Use Designation: Open Space (Recreation)
Density: N/A
Floor Area Ratio: N/A

7. Zoning

Use Regulation:	S80, Open Space
Minimum Lot Size:	N/A
Special Area Regulation	None

8. Description of Project

The proposed Moosa Creek Restoration Project (Project) is a Grading Permit for the restoration of riparian and upland habitats on 67 acres of land within the Bonsall Community Plan area that contains a portion of the former Moosa Creek Golf Course. The project site is subject to the General Plan Regional Category Rural/Semi-Rural, Land Use Designation Open Space (Recreation)/Rural Lands. Zoning for the site is Open Space Use (S80). The project site is located between State Route-76 and Interstate-15 and south of Camino Del Rey and is bisected by Moosa Creek. The on-site reach of the creek flows from the eastern end of the project site westward where it exits the project site at the western end of Old River Road. From the southwestern site boundary, Moosa Creek continues another half mile off site before ultimately flowing into the San Luis Rey River.

The Project is for the restoration of the riparian and upland riparian habitat and floodplain of Moosa Creek and would entail the removal of existing golf course infrastructure and the recontouring of portions of the property to be planted with native species. The Conceptual Restoration Plan depicts the conceptual restoration proposed for the project site. Approximately 35,000 cubic yards of soil and approximately 6,000 cubic yards of asphalt, concrete and other infrastructure will be excavated. Soil will be relocated to create upland habitats, while concrete and asphalt will either be broken and placed under soil relocated in upland habitats. If any material needs to be exported off-site for disposal (such as demolition of a golf course feature), it would be limited (i.e., one truck trip). Approximately 10 acres of the project site contains existing riparian habitat along Moosa Creek, with the remainder featuring ornamental and non-native vegetation and developed areas consistent with the previous use as a golf course. Planned restoration activities would consist of regrading the area adjacent to the creek and removing approximately 4.5 acres of existing infrastructure (tennis courts, parking lots, golf course features, etc.) to establish and/or enhance approximately 39 acres of riparian habitat and approximately 28 acres of native riparian-upland transitional buffers and other site improvements. The Project would remove five existing golf cart bridges over Moosa Creek and associated riprap supports on either bank of each bridge.

Proposed earthwork would be conducted to extend the top of the Moosa Creek bank to create a high flow terrace/floodplain. Restoration strategies planned for the Project site include riparian re-establishment (consisting of a mulefat-willow dominated riparian habitat that may also include wetlands, depending on conditions), floodplain re-establishment (floodplain transitional species that include riparian and upland species), coast live oak savannah re-establishment (coast live oak savannah with associated species), and riparian enhancement (control of non-native species and light seeding or planting). The Project would re-establish and rehabilitate riparian habitat for endangered species. The restoration effort would be implemented under the guidance of the United

States Fish and Wildlife Service (USFWS) to offset corresponding endangered species riparian habitat impacts at the Marine Corps Air Station (MCAS) at Camp Pendleton.

Project implementation is anticipated to commence in the winter of 2021 with potential adjustments in timing to account for weather and/or to avoid sensitive bird breeding and nesting seasons. While one construction stage is anticipated, the overall work may be implemented in two distinct phases: demolition/earthwork and planting.

After construction, the restoration areas would be monitored and, as necessary, invasive species removal and other vegetation management activities would be performed to maintain the site as a mosaic of riparian and upland habitats. During these monitoring and maintenance activities, the Project site would require limited operational activity such as biannual mowing and quarterly landscaping.

9. Surrounding land uses and setting:

The Project site is located in unincorporated San Diego County, within the Bonsall Community Plan area on a portion of an abandoned golf course. The project site is bounded by Camino Del Rey to the north-northeast, Calle De Las Estrellas and Old River Road to the west, and Golf Club Drive to the south. The overall project area is approximately 67 acres and is adjacent to a newly developing residential neighborhood and nearby Bonsall Elementary School to the west; existing residential neighborhoods to the south, east, and southeast; a residential condominium complex to the north; and San Luis Rey Training Center to the east. The Project site is located approximately 0.4-mile east of the intersection of State Route-76 (Mission Road) and Camino Del Rey/Olive Mill Road. The project site contains facilities from the abandoned golf course and heavily disturbed habitats. The topography of the project site is generally level with isolated pockets of steep slopes around the perimeter. The surrounding development occurs above grade of the project site. The 100-year floodplain is mapped by the Federal Emergency Management Agency (FEMA) across the Project site along Moosa Creek.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

Permit Type/Action	Agency
Nationwide Permit 27	U.S. Army Corps of Engineers
Section 7, Endangered Species Consultation	U.S Fish and Wildlife Service
Section 1602, Streambed Alteration Agreement	California Department of Fish and Game
401 Permit, Water Quality Certification	Regional Water Quality Control Board
404 Permit – Dredge and Fill (if required)	US Army Corps of Engineers (ACOE)
General Construction Storm Water Permit	Regional Water Quality Control Board
Letter of Map Revision and/or Conditional Letter of Map Revision	Federal Emergency Management Agency

The Project may require other approvals not listed in this table.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code §21080.3.1? If so, has consultation begun?

YES

☒

NO

☐

Note: Conducting consultation early in the CEQA process allows tribal governments, public lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and to reduce the potential for delay and conflict in the environmental review process (see Public Resources Code §21083.3.2). Information is also available from the Native American Heritage Commission's Sacred Lands File per Public Resources Code §5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code §21082.3(e) contains provisions specific to confidentiality.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: The environmental factors checked below would be potentially affected by this project and involve at least one impact that is a "Potentially Significant Impact" or a "Less Than Significant With Mitigation Incorporated," as indicated by the checklist on the following pages.

<input type="checkbox"/> Aesthetics	<input type="checkbox"/> Agriculture and Forest Resources	<input type="checkbox"/> Air Quality
<input checked="" type="checkbox"/> Biological Resources	<input checked="" type="checkbox"/> Cultural Resources	<input type="checkbox"/> Energy
<input checked="" type="checkbox"/> Geology & Soils	<input type="checkbox"/> Greenhouse Gas Emissions	<input type="checkbox"/> Hazards & Hazardous Materials
<input type="checkbox"/> Hydrology and Water Quality	<input type="checkbox"/> Land Use & Planning	<input type="checkbox"/> Mineral Resources
<input type="checkbox"/> Noise	<input type="checkbox"/> Population & Housing	<input type="checkbox"/> Public Services
<input type="checkbox"/> Recreation	<input type="checkbox"/> Transportation	<input checked="" type="checkbox"/> Tribal Cultural Resources
<input type="checkbox"/> Utilities and Service Systems	<input type="checkbox"/> Wildfire	<input checked="" type="checkbox"/> Mandatory Findings of Significance

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- ☐ On the basis of this Initial Study, Planning & Development Services finds that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ On the basis of this Initial Study, Planning & Development Services finds that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ On the basis of this Initial Study, Planning & Development Services finds that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

Signature

Jenna Roady

Printed Name

May 27, 2021

Date

Land Use/Environmental Planner

Title

INSTRUCTIONS ON EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, Less Than Significant with Mitigation Incorporated, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4. "Less Than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are "Less Than Significant With Mitigation Incorporated," describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. The explanation of each issue should identify:
 - a. The significance criteria or threshold, if any, used to evaluate each question; and
 - b. The mitigation measure identified, if any, to reduce the impact to less than significance

I. AESTHETICS – Would the Project:

a) Have a substantial adverse effect on a scenic vista?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

A vista is a view from a particular location or composite views along a roadway or trail. Scenic vistas often refer to views of natural lands but may also be compositions of natural and developed areas, or even entirely of developed and unnatural areas, such as a scenic vista of a rural town and surrounding agricultural lands. What is scenic to one person may not be scenic to another, so the assessment of what constitutes a scenic vista must consider the perceptions of a variety of viewer groups.

The items that can be seen within a vista are visual resources. Adverse impacts to individual visual resources or the addition of structures or developed areas may or may not adversely affect the vista. Determining the level of impact to a scenic vista requires analyzing the changes to the vista as a whole and also the changes to individual visual resources.

As described in the General Plan Update Environmental Impact Report (GPU EIR; County of San Diego 2011), the County contains visual resources affording opportunities for scenic vistas in every community. Resource Conservation Areas (RCAs) are identified within the GPU EIR and are the closest that the County comes to specifically designating scenic vistas. Many public roads in the County currently have views of RCAs or expanses of natural resources that would have the potential to be considered scenic vistas. Numerous public trails are also available throughout the County. New development can often have the potential to obstruct, interrupt, or detract from a scenic vista.

Less than Significant Impact: The project site is located within the Bonsall Community Plan area, approximately 0.4 mile east of State Route 76 (SR-76) and south of Camino Del Rey. There are four RCAs identified within the Bonsall Community Plan, including the Mission Road RCA directly adjacent to the project site, which is noted for its biological values along Ostrich Creek. However, no designated RCAs exist within the project area. The nearest RCA to the project site designated for scenic resources is the San Marcos Mountains RCA, which is recognized in the Bonsall Community Plan as a visual landmark of great scenic beauty. Due to distance and intervening topography, there are no scenic vistas identified within the County General Plan or Bonsall Community Plan that would be affected by the Project. The Project site currently features both native and non-native (weedy) vegetation along with deteriorated and unused infrastructure (tennis courts, parking lots, golf course features, etc.) associated with the former golf course. The Project site is, therefore, not highly scenic in character, other than it features open space containing stands of mature riparian and woodland trees and generally undeveloped land. The Project would remove the golf course infrastructure and non-native vegetation, recontour the landscape, and plant native species. These improvements would create a beneficial effect on the aesthetics of the Project site by restoring the riparian and upland landscape that surrounds the on-site reach of Moosa Creek and its adjoining floodplain.

These aesthetic improvements would be visible from surrounding private properties and public roads in the project area, none of which are designated scenic vistas. Therefore, the Project would not have an adverse effect on a recognized scenic vista. Refer to response I (b) Aesthetics below for a discussion of effects on scenic roadways in the project area.

The project's viewshed and past, present, and future projects within that viewshed were evaluated to determine their cumulative effects on scenic vistas. Refer to XXI: MANDATORY FINDINGS OF SIGNIFICANCE for a comprehensive list of the projects considered. Those cumulative projects are not located within the viewshed of an RCA and would not contribute to a cumulative impact to a scenic viewshed as none occur within the Project area. In addition, cumulative projects in the vicinity of the RCAs in the Bonsall Community Plan area would be designed to be compatible with the overall visual character of the area. Therefore, the Project would not result in adverse Project-level or cumulative-level impacts on a scenic vista.

b) Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less than Significant Impact: State scenic highways refer to those highways that are officially designated by the California Department of Transportation (Caltrans) as scenic or are eligible for such designation (Caltrans - California Scenic Highway Program). Generally, the area defined within a State scenic highway is the land adjacent to and visible from the vehicular right-of-way. The dimension of a scenic highway is usually identified using a motorist's line of vision, but a reasonable boundary is selected when the view extends to the distant horizon. The scenic highway corridor extends to the visual limits of the landscape abutting the scenic highway.

Only two highways in the unincorporated County have been designated as a State scenic highway: SR-78 through the Anza-Borrego Desert State Park and SR-125 between I-8 and SR-94. Eligible scenic highways include portions of I-5, I-15, SR-94, I-8, SR-79, SR-78, and SR-76 within the unincorporated County. No routes in the unincorporated County have been officially designated as a County Scenic Highway. However, SR-76 from El Camino Real to I-15 (excluding the Oceanside segments) is considered a first priority scenic route as identified within the County's Guidelines for Determining Significance for Visual Resources. The closest eligible State scenic highway is I-15, which is approximately 5 miles east of the project site, while SR-76, a first priority scenic route, is situated 0.4 mile to the west of the project site. The Project is not located near, or visible within, the viewsheds of either of these State scenic highways and would not damage or remove visual resources within a State scenic highway. Due to distance, topography, and vegetation, the project site would also not be visible from SR-76 or I-15. Camino del Rey from SR-76 to its terminus at Old Highway 395 is included in the County's General Plan Conservation and Open Space Element, Table COS-1, as a County-designated scenic highway. The project site is visible on a limited basis from the travel lanes of Camino del

Rey, which bounds a portion of the northern site boundary for a distance of a few hundred feet. The habitat restoration improvements would temporarily degrade the project site during the construction phase but would ultimately enhance the quality of views afforded from the road. The Project would also complement the rural character of the Bonsall community by re-establishing native habitats that were removed by golf course use in the 1960s. Therefore, the Project would not have any substantial adverse effects on a scenic resource within a State scenic highway.

The Project's viewshed and past, present, and future projects within that viewshed were evaluated to determine their cumulative effects. Refer to XXI. Mandatory Findings of Significance for a comprehensive list of the projects considered. Those projects are also not located within the viewshed of a State scenic highway but are situated along Camino Dey Rey. Implementation of the cumulative projects would not contribute to a cumulative impact because the designs of the cumulative projects have been or would be compatible with the County General Plan goals protecting scenic resources. Therefore, the Project would not result in an adverse Project-level or cumulative-level effect on a scenic resource within a State County scenic highway.

- c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less than Significant Impact: Visual character is the objective composition of the visible landscape within a viewshed. Visual character is based on the organization of the pattern elements line, form, color, and texture. Visual character is commonly discussed in terms of dominance, scale, diversity, and continuity. Visual quality is the viewer's perception of the visual environment and varies based on exposure, sensitivity, and expectation of the viewers.

The Project would remove existing golf course infrastructure, that is currently in disrepair, as well as weedy, non-native vegetation that occurs throughout the project site. Project improvements would regrade the project site to conform to the floodplain for Moosa Creek and allow for the installation of riparian and woodland habitats on both sides of the creek. Certain large native woodland trees would be retained to compliment the riparian restoration efforts. Implementation of the Project would enhance the visual character of the Project site by removing its disorganized appearance and creating a beneficial aesthetic effect. Temporary visual impacts would occur during the disturbance of the project site during the construction phase, resulting in visible construction activities, large, exposed soil surfaces, and sparsely vegetated areas, which would affect public views of the Project from local roads, including Camino Del Rey and Golf Course Drive. While enhancement and establishment of riparian vegetation on the project site would take a number of years to complete, temporary visual impacts would be replaced by a fully

restored riparian and woodland landscape that would complement the rural character of the project area and the Bonsall Community Plan area. The restored site would result in a permanent beneficial change to visual character of the project site and surrounding areas. Therefore, the Project would not result in a substantial effect on the existing visual character or quality of the Project site and its surroundings.

The Project would not contribute to adverse cumulative impacts on visual character or quality because the changes in visual character would be beneficial and other project's impacts to visual character are addressed on a project-level for their compliance with County policies related to visual character. Refer to XXI. Mandatory Findings of Significance for a comprehensive list of the projects considered. Only one of the listed projects is located within the viewshed surrounding the Project but it would not contribute to an adverse cumulative impact because that project is visually integrated into the surroundings in an unobtrusive manner. Therefore, the Project would not result in any adverse project-level or cumulative-level effects on visual character or quality on-site or in the surrounding area.

d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

No Impact: The project site is located in Zone B, as identified by the County Light Pollution Code, outside the 15-mile buffer established in the County General Plan for the Palomar Observatory to protect the dark skies needed to conduct astronomical research. In addition, the Project would not use outdoor light fixtures or create a new permanent source of night lighting given the habitat restoration nature of the Project. Construction working hours would be limited to Monday through Saturday from 7:00 AM until 7:00 PM, consistent with the County of San Diego (County) Noise Ordinance. No construction activities would occur after dark and no night lighting would be required. No glare would be produced by the Project given that no above-ground structures or lighting fixtures would be constructed as part of the restoration efforts. Therefore, the Project would not adversely affect day or nighttime views in the area.

The Project would not contribute to significant cumulative impacts on day or nighttime views because the Project would not create a new source of glare or lighting. Compliance with the Light Pollution Code is required prior to issuance of any building permit for any project. Mandatory compliance for all new building permits ensures that the cumulative projects would not cause a cumulatively significant impact. Therefore, the Project would not contribute to or cause a significant new source of substantial glare that would adversely affect daytime or nighttime views in the area.

II. AGRICULTURE AND FORESTRY RESOURCES – Would the project:

- a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, or other agricultural resources, to non-agricultural use?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

No Impact: The project site was modified in the 1960s for the development of the former golf course and contains no active agricultural uses. The project site is mapped as containing Grangeville fine sandy loam (GoA) and Tujunga sand, 0 to 5 percent slope (TuB). These soils are considered prime and statewide significance soils pursuant to the County's Guidelines for Determining Significance for Agricultural Resources and Geographic Information System (GIS) database. However, the Project site is mapped as "Urban and Built-Up Land" by the California Department of Conservation because of its prior golf course use, according to the Farmland Mapping and Monitoring Program (California Department of Conservation 2016). In addition, the site would not be likely to support future agriculture production because the prior golf course use may have compromised the soil quality, making it unusable for agricultural production. Therefore, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance to non-agricultural use.

- b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

No Impact: The project site is not under a Williamson Act contract, nor is it surrounded by any such land. Additionally, the project site does not include any area zoned for agricultural use. The nearest agricultural preserve lands and lands under contract are located approximately one mile south of the project site. Therefore, the Project would not conflict with existing zoning for agricultural use, or a Williamson Act contract.

- c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 220(g)), or timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

No Impact: The project site does not contain forest lands or timberland. The County does not have any existing Timberland Production Zones. In addition, the Project is consistent with existing zoning and a rezone of the property is not proposed. Therefore, Project implementation would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland production zones.

- d) Result in the loss of forest land, conversion of forest land to non-forest use, or involve other changes in the existing environment, which, due to their location or nature, could result in conversion of forest land to non-forest use?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

No Impact: The project site does not contain any forest lands as defined in Public Resources Code Section 12220(g); therefore, Project implementation would not result in the loss or conversion of forest land to a non-forest use. In addition, the Project is not located in the vicinity of offsite forest resources.

- e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Important Farmland or other agricultural resources, to non-agricultural use?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

No Impact: The project site does not contain important Farmlands or other agricultural resources as noted under response II (a): Agriculture and Forestry Resources. The project site was developed as a golf course in the 1960s and does not contain any active agricultural operations. Additionally, the project site is not a significant agricultural resource (see response II (b): Agriculture and Forestry Resources for details). In addition, the site would not be likely to support future agriculture production because the prior golf course use may have compromised the soil quality, making it unusable for agricultural production. Therefore, no Prime Farmland, Unique Farmland, Farmland of Statewide or Local Importance, or active agricultural operations would be converted to a non-agricultural use upon project implementation.

III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:

- a) Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Less than Significant Impact: The Regional Air Quality Standards (RAQS) and State Implementation Plan (SIP) rely on the San Diego Association of Government's (SANDAG) growth projections, which are developed based on proposed buildout of land uses identified in the County's General Plan. Because the RAQS and SIP project future air quality conditions based on growth projections of the County's General Plan, it is assumed that a project that generates fewer emissions than what is allowable under its existing General Plan designation would also comply with the RAQS and SIP. According to the 2016 RAQS, mobile sources are the largest contributor to air quality emissions, specifically emissions generated from operations of typical residential and commercial developments, and therefore can be used to define project intensity (i.e., less mobile emissions results in less land use intensity).

As discussed in response XI (b): Land Use and Planning, the Project is a habitat restoration improvement proposed on a site that is planned for open space in both the County General Plan and Bonsall Community Plan. Temporary air emissions would be produced during Project construction activities, as discussed in response III (b): Air Quality. However, no new urban development is proposed, and no long-term mobile source emissions would be produced once the restoration work and monitoring/maintenance activities are complete. The Project is consistent with the intended use of the site (i.e., Open Space) and, therefore, consistent with the regional growth projections by SANDAG and those used in the development of the RAQS and SIP. The Project would not conflict with or obstruct the implementation of the RAQS or SIP.

- b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Less than Significant Impact: The following discussion is based on Project CalEEMod calculations dated July 7, 2020 (Air Quality Calculations). San Diego County is presently in non-attainment for the National and California Ambient Air Quality Standard (NAAQS and CAAQS, respectively) for ozone (O_3). San Diego County is also presently in non-attainment for concentrations of Particulate Matter less than or equal to 10 microns (PM_{10}) and concentrations of Particulate Matter less than or equal to 2.5 microns ($PM_{2.5}$) under the CAAQS. O_3 is formed when Volatile Organic Compounds (VOCs) and oxides of Nitrogen (NO_x) react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil); solvents; petroleum processing and storage; and pesticides. Sources of PM_{10} and $PM_{2.5}$ in both urban and rural areas include motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.

The California Emissions Estimator Model (CalEEMod) Version 2016.3.2 was used to estimate emissions for the construction phase of the Project. The peak construction scenario was modelled as part of the analysis. Inputs into the emissions model included specific construction activities, timing, and types and numbers of construction equipment. CalEEMod only allows pre-set land use types in the model, therefore the closest land use type to the Project was selected (the Recreational – City Park land use type). The size of the project input into CalEEMod was 67 acres. Table 1 shows each construction phase for the Project, the number of days for each construction phase, and the type and number of equipment used in each phase that was modelled in CalEEMod. The equipment usage includes all phases of construction and associated activities. No import or export of materials is expected to or from the site. Materials that are excavated will be reused on the Project site. Though not anticipated, if any material needs to be exported off-site for disposal (such as demolition of a golf course feature), it would be limited (i.e., one truck trip) and would not contribute to exceedances of emissions thresholds.

Table 1. Construction Phases and Equipment Modelled in CalEEMod

Construction Phase	Number of Construction Phase Days	Type of Construction Equipment Used	Number of Construction Equipment Used	Construction Equipment Hours per Day Usage
Demolition	12	Excavator	2	8
		Forklift	2	8
		Off-Highway Truck	4	8
		Tractor/Loader/Backhoe	2	8
Site Preparation	5	Off-Highway Truck	2	8
		Rubber Tired Dozer	2	8
		Scraper	2	8
		Tractor/Loader/Backhoe	2	8
Grading	90	Excavator	1	8
		Forklift	2	8
		Off-Highway Truck	4	8
		Rubber Tired Dozer	2	8
		Scraper	4	8
		Skid Steer Loader	1	8
		Tractor/Loader/Backhoe	1	8

For the Site Preparation construction phase, the total acres graded input into CalEEMod was 4.35 acres. For the Grading construction phase, the total acres graded input into CalEEMod was 27 acres. The number of worker trips per day modelled in CalEEMod was 40 (based on 2 trips per day for 20 workers to and from the construction site) and 16 vendor trips per day (based on 2 trips per day for 8 vendors). The CalEEMod default trip length and vehicle type were used for these trips. CalEEMod defaults were used for on-road fugitive dust calculations. Watering of exposed areas twice per day was incorporated into CalEEMod calculations to reduce fugitive dust. Based on the modelling exercise, the Project would temporarily contribute Reactive Organic Compounds (ROG), PM₁₀, PM_{2.5}, NO_x, Carbon Monoxide (CO), Sulfur Dioxide (SO₂), and VOC emissions during construction/grading activities; however, the incremental increase would not exceed established screening-level thresholds (SLTs) (see Air Quality Calculations) as shown in Table 2, below. The SLTs were adopted from the San Diego Air Pollution Control District (SDAPCD) trigger level thresholds to be protective of the National Ambient Air Quality Standards (NAAQS). Thus, air quality emissions below the SLTs would meet the NAAQS. The NAAQS were developed to protect public health, specifically the health of “sensitive” populations, including asthmatics, children, and the elderly. The County of San Diego adopted the SDAPCD’s trigger level thresholds as SLTs to be protective of public health. The SLTs adopted by San Diego County are shown below in Table 2.

Table 2. **Construction Emissions Compared to Screening Level Thresholds**

	VOC	NO _x	CO	SO ₂	PM ₁₀ ¹	PM _{2.5} ¹	Lead
Maximum Daily Construction Emissions (lbs/day)	9.19	94.94	61.25	0.15	16.73	10.39	N/A
Threshold of Significance (lbs/day)	75**	250	550	250	100	55*	3.2
Significant Impact?	No	No	No	No	No	No	No

* EPA "Proposed Rule to Implement the Fine Particle National Ambient Air Quality Standards" published September 8, 2005.

**Threshold for VOCs based on the threshold of significance for VOCs from the South Coast Air Quality Management District for the Coachella Valley.

Grading activities associated with construction of the Project would be subject to the County Grading Ordinance and SDAPCD Rule 55, which require the implementation of dust control measures. Once the construction phase work is complete, there would be negligible emissions associated with the monitoring and maintenance activities and no operational sources after the maintenance period is complete.

None of the cumulative projects in the vicinity would be constructed at the same time as the Project or in close proximity to the Project such that the temporary construction emissions would overlap. In addition, construction emissions are temporary and would not result in long-term changes to ambient air quality levels. Therefore, the Project would not result in cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment.

c) Expose sensitive receptors to substantial pollutant concentrations?

- ☐ Potentially Significant Impact
 ☒ Less than Significant Impact
- ☐ Less Than Significant With Mitigation Incorporated
 ☐ No Impact

Less than Significant Impact: Sensitive receptors include schools (preschool-12th Grade), hospitals, resident care facilities, day-care centers, residences, and other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality.

The closest sensitive receptors to the project site include single-family and multi-family residential units adjacent to the west, north, and east sides of the project site and the Bonsall Elementary School and Community Center located approximately 500 feet west of the Project site at its closest point. Emissions of potentially harmful pollutants, including diesel particulate matter (DPM) and fugitive dust, would be generated on-site during construction activities. The Project would be required to comply with the County Grading Ordinance and SDAPCD Rule 55 which would reduce potential emissions of fugitive dust. The Project-related modeling showed that unmitigated emissions would not exceed any

thresholds (as shown in the Air Quality Calculations). However, all construction equipment used for the Project would be equipped with Tier 4 engines with diesel particulate filters (DPF), which would further reduce emissions of DPM. Construction emissions would be temporary and would not expose sensitive receptors to harmful concentrations of air pollutants.

As indicated in response III (b): Air Quality, the trigger level thresholds developed by the SDAPCD and adopted by the County as SLTs would not be exceeded by Project construction and sensitive receptors would not be exposed to an incremental health risk. As mentioned, the County's SLTs were adopted to align with the NAAQS, which were developed to be protective of human health. Because the project would not exceed the County's SLTs, no adverse health impacts would occur especially of sensitive populations. In addition, the implementation of Tier 4 construction equipment with DPF would further reduce onsite PM₁₀ from construction exhaust emissions (i.e. DPM).

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less than Significant Impact: Temporary odors could be produced by demolition and earth moving equipment operation (generated by diesel exhaust); however, these odorous substances, if present at all, would be minimal and temporary. Therefore, the Project would not result in other significant emissions such as odors.

IV. BIOLOGICAL RESOURCES – Would the project:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less than Significant with Mitigation Incorporated: The following response is based on Project-specific biological studies conducted by Blackhawk Environmental (see Biological Resources Studies), which included the following: Vegetation Communities and Mapping Update Report; Focused Rare Plant Survey Report; Least Bell's Vireo and Southwestern Willow Flycatcher Survey Results Memo, and Moosa Creek Jurisdictional Verification and Update Report. Additionally, the analysis considered the County's Comprehensive Matrix of Sensitive Species, and previous biological studies of the Project site (WRA 2015).

The Project site supports native riparian habitat containing six identified least Bell's vireo (*Vireo bellii pusillus*; LBVI, a federally and state-endangered riparian bird species) territories and mature native and non-native trees which may provide habitat for raptors. Southwestern willow flycatcher (*Empidonax traillii extimus*; SWFL) protocol surveys were also conducted to determine if this federally and state-endangered riparian bird species is also present, but no SWFL were observed during the surveys. The Project site contains several mature native and non-native trees which can provide habitat for raptors, which have a high potential for occurrence onsite. In general, a relatively large number of special-status species have at least a moderate potential to occur within the project site due to the fact that the project site contains riparian habitat and includes a stream corridor that connects the San Luis Rey River approximately half a mile downstream.

Rare plant surveys were also conducted during the appropriate time of year with no sensitive plant species detected on the project site. Eleven sensitive species were known to occur within five miles of the project site, with nine being eliminated from further review due to the lack of suitable habitat onsite. Suitable habitat for the remaining two species (San Diego ambrosia [*Ambrosia pumila*] and smooth tarplant [*Centromadia pungens* ssp. *laevis*]) exists, but due to the use of the project site as a golf course, the potential of these species to occur is very low due to lack of a seedbank.

Although the restoration work is designed to avoid the existing riparian habitat, to the extent feasible, there would be some minor temporary impacts during the restoration process consisting of minimal vegetation disturbance for enhancement activities and minor grading to connect the existing habitat with the restoration/enhancement efforts (see Conceptual Restoration Plan). In order to provide for the restoration and long-term management of the proposed open space preserve, a Riparian Restoration Habitat Management Plan will be prepared and submitted to the County as a project condition of approval (see mitigation measure BIO#1). Temporary conservation easement signage will also be installed to protect the proposed conservation easement from entry (see mitigation measure BIO#2). In order to comply with the State and Federal Regulations, the required wetland permits shall be provided to the County. If the wetland permits are not required, verification that they are not required by the U.S. Army Corps of Engineers and CA Department of Fish and Wildlife shall be provided (see mitigation measure BIO#3). Non-native plant removals and light grading in or immediately adjacent to riparian habitat would be restricted to occur outside the riparian bird breeding season (March 15 to September 15) to avoid impacts to these species. Should work occur during the riparian bird breeding season, mitigation measure BIO-4 would be implemented to minimize and avoid impacts to sensitive species. In order to protect sensitive biological resources in perpetuity, a conservation easement will be granted prior to rough grading release (see mitigation measure BIO#5). Permanent conservation easement fencing will be installed to the satisfaction of the U.S. Fish and Wildlife Service prior to final grading release (see mitigation measure BIO#6). The Project would re-establish and rehabilitate riparian habitat for special-status species. Ultimately, the Project would yield a net benefit to riparian habitat and species.

BIO#1: In order to provide for the restoration and long-term management of the proposed open space preserve, a Riparian Restoration Habitat Management Plan shall be prepared and implemented prior to approval of any plan or issuance of any permit.

BIO#2: In order to protect the proposed open space easement from entry, informational signs shall be installed. The applicant shall install the signs and provide evidence that the open space signs have been placed to the satisfaction of USFWS prior to approval of any plan or issuance of any permit.

BIO#3: In order to comply with the State and Federal Regulations, the following agency permits, or verification that they are not required, shall be obtained prior to approval of any grading and issuance of any grading or construction permits: Clean Water Act, Section 401/404 permit issued by the California Regional Water Quality Control Board and the U.S. Army Corps of Engineers for all project related disturbances of waters of the U.S. and/or associated wetlands; and a Section 1602 Streambed Alteration Agreement issued by the California Department of Fish and Wildlife for all project related disturbances of any streambed.

BIO#4: In order to avoid impacts to riparian birds, which are a sensitive biological resource pursuant to the Migratory Bird Treaty Act (MBTA) and the County's Guidelines for Determining Significance for Biological Resources, a Resource Avoidance Area (RAA) shall be implemented on all plans. The Project contractor shall avoid the riparian bird breeding season (March 15 to September 15) when conducting restoration work in sensitive riparian habitat. If construction activities must occur during the riparian bird breeding season (March 15 to September 15), a qualified biologist shall be retained to survey the trees and other vegetation for riparian bird nests (focusing on least Bell's vireo) within 300 feet of all proposed ground disturbing activity. The survey shall be conducted no more than three days prior to the activity. If no nests are detected, work may commence with a biological monitor present to ensure no sensitive species are impacted. If active nests are detected, the USFWS shall be consulted to determine an appropriate buffer that should be established until nestlings fledge. The Applicant shall comply with USFWS guidance. Typically, a buffer of at least 300 feet (down to 100-feet depending on agency approval) shall be set up and no work shall occur within the buffer area until the nest has been monitored to be successful, failed, or the breeding season has elapsed.

BIO#5: In order to protect sensitive biological resources, a conservation easement shall be granted prior to rough grading release.

BIO#6: In order to protect the conservation easement from entry, signage shall be installed to the satisfaction of the U.S. Fish and Wildlife Service prior to Final Grading Release.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less than Significant Impact: Project-specific biological studies were conducted by Blackhawk Environmental dated July 20, 2020 and are contained in the Biological Resource Studies. Based on the results of the vegetation mapping and wetland delineation update reports prepared by Blackhawk Environmental, the project site contains 11 sensitive vegetation communities. These sensitive vegetation communities include riparian woodland (arroyo willow association, disturbed arroyo willow association, Fremont cottonwood-arroyo willow association, disturbed Fremont cottonwood-arroyo willow association, Fremont cottonwood-Goodding's willow association, Fremont cottonwood association, mulefat-arroyo willow association, and disturbed mulefat association), wetland (freshwater marsh and non-native herbaceous wetland), and coast live oak woodland habitats. The project site also includes disturbed, developed land and non-native vegetation. A summary of the existing vegetation is contained in Table 1 below. Upon completion, the Project will have restored the entire site to native habitats as described in Table 2 below.

Table 3. Existing Vegetation Communities

Existing Vegetation Communities	Acreage	Total
Non-Native/Developed		
Non-native grassland	16.96	47.8
Ruderal weeds	16.74	
Non-native herbaceous wetland	3.82	
Ornamental landscaping	3.42	
Developed	3.19	
Irrigated ornamental plants	3.02	
Disturbed habitat	0.41	
Rip-rap	0.14	
Annual bluegrass turf	0.14	
Oak/Open Water		
Riverine channel	1.87	2.7
Coast live oak woodland	0.54	
Open water	0.30	
Riparian		
Arroyo willow association	6.03	16.1
Mulefat-arroyo willow association	2.65	
Disturbed Fremont cottonwood-arroyo willow association	2.25	
Fremont cottonwood association	2.11	
Fremont cottonwood-arroyo willow association	2.09	
Freshwater Marsh	0.50	
Disturbed Mulefat association	0.43	
Disturbed Arroyo willow association	0.04	
Fremont cottonwood-Goodding's willow association	0.03	
Total	66.7	66.7

Table 4. Proposed Vegetation Communities

Proposed Vegetation Communities	Acreage
Riparian Enhancement	11.9
Riparian Re-Establishment	14.0
Coast Live Oak Savannah Re-establishment	18.7
Floodplain Re-Establishment	13.0
Native grassland/other native (easements and fuel mod areas) ¹	9.1
Total	66.7

¹ Easement and fuel modification zones will be seeded with native species.

No permanent impacts to sensitive vegetation communities would occur because the amount of habitat impacted would be offset by the restoration work (see Conceptual Restoration Plan). Therefore, the Project would result in a net increase of California Department of Fish and Wildlife (CDFW) wetlands and riparian habitat from an approximately 16-acre pre-project condition to approximately 39 acres of wetland and riparian habitat once the proposed restoration work is completed. The net increase in riparian habitat, in addition to the approximately 19 acres of native upland habitat that would also be restored, would result in beneficial permanent impacts to riparian or other sensitive natural communities. In order to protect the sensitive biological resources in perpetuity, a conservation easement will be recorded with the U.S. Fish and Wildlife Service as a project condition of approval (see mitigation measure BIO#5 in response (a) above). In addition, long term management of the open space preserve will be implemented through a Riparian Restoration Habitat Management Plan with the U.S. Fish and Wildlife Service (see mitigation measure BIO#1 in response (a) above). Biological open space signage will also be installed to the satisfaction of the U.S. Fish and Wildlife Service (see mitigation measure BIO#6 in response (a) above).

- c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

☐ Potentially Significant Impact ☒ Less than Significant Impact

☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

Less than Significant Impact: The following discussion is based on the Moosa Creek Jurisdictional Verification and Update Report by Blackhawk Environmental dated July 20, 2020 (See Biological Resource Studies). Based on the results of the study, it has been determined that wetlands and waters, as defined by Section 404/401 of the Clean Water Act and Section 1600 of the California Fish and Game code, are present in association with the on-site portion of Moosa Creek (see Tables 3 through 5). The Project would temporarily impact some state and federally protected wetlands and waters onsite via grading associated with restoration activities and the removal of five existing golf cart bridges that span Moosa Creek, including associated rip-rap supports on either bank of each bridge. The Conceptual Restoration Plan depicts the proposed restoration activities at the project site. Prior to initiating the restoration work, the applicant would obtain required permits under Section 404/401 of the Clean Water Act and Section 1600 of the California Fish and Game Code for these temporary impacts (see mitigation measure BIO#3 in response (a) above). The project involves the restoration of the on-site reach of Moosa Creek to a more natural state by creating a wider riparian floodplain via grading to connect the stream to the floodplain, along with removing the man-made structures that currently cross the drainage. Existing degraded wetlands at the upstream end of Moosa Creek would be enhanced, non-native herbaceous wetlands north and south of Moosa Creek would be restored, the artificial pond north of the creek would be restored, and the ponds south of the creek adjacent to the tennis courts would be converted from open

water to riparian wetland. Up to 39 acres of wetland and riparian habitat are planned to be restored, with another 18.7 acres of native upland buffer (Table 2). The Project would require permit approval and compliance with required permit conditions from USACE, RWQCB, and CDFW. Therefore, all these temporary impacts would be subsequently restored to biologically equivalent or superior conditions as part of the restoration work therefore impacts are less than significant.

Table 5. Potential U.S. Army Corps of Engineers Jurisdictional Wetlands and Waters on Project site

Jurisdictional Areas	Acres
Wetland Waters of the U.S.	11.772
<i>Arroyo willow association</i>	2.9
<i>Disturbed arroyo willow association</i>	0.037
<i>Disturbed Fremont cottonwood-arroyo willow association</i>	0.346
<i>Disturbed herbaceous wetland</i>	3.969
<i>Fremont cottonwood-arroyo willow association</i>	2.057
<i>Freshwater marsh</i>	0.335
<i>Mulefat-arroyo willow association</i>	2.128
Non-Wetland Waters of the U.S.	2.137
<i>Developed Channel</i>	0.003
<i>Open Water</i>	0.305
<i>Riverine channel</i>	1.829
Potential USACE Total Jurisdiction	13.909

Table 6. Potential Regional Water Quality Control Board Jurisdictional Wetlands and Waters on Project site

Jurisdictional Areas	Acres
Isolated Wetland Waters of the State	1.375
<i>Disturbed Fremont cottonwood-arroyo willow association</i>	1.375
Wetland Waters of the State	11.772
<i>Arroyo willow association</i>	2.9
<i>Disturbed arroyo willow association</i>	0.037
<i>Disturbed Fremont cottonwood-arroyo willow association</i>	0.346
<i>Disturbed herbaceous wetland</i>	3.969
<i>Fremont cottonwood-arroyo willow association</i>	2.057
<i>Freshwater marsh</i>	0.335
<i>Mulefat-arroyo willow association</i>	2.128
Non-Wetland Waters of the State	2.137
<i>Developed Channel</i>	0.003
<i>Open Water</i>	0.305
<i>Riverine channel</i>	1.829
Potential RWQCB Total Jurisdiction	15.284

Table 7 Potential California Department of Fish and Wildlife Jurisdictional Wetlands and Waters on Project site

Jurisdictional Areas	Acres
Wetland/Riparian	17.545
<i>Arroyo willow association</i>	6.072
<i>Disturbed arroyo willow association</i>	0.037
<i>Disturbed Fremont cottonwood-arroyo willow association</i>	2.252
<i>Disturbed herbaceous wetland</i>	3.969
<i>Fremont cottonwood-arroyo willow association</i>	2.057
<i>Freshwater marsh</i>	0.503
<i>Mulefat-arroyo willow association</i>	2.655
Lake/Streambed	2.134
<i>Open Water</i>	0.305
<i>Riverine channel</i>	1.829
Potential CDFW Total Jurisdiction	19.679

- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

☐ Potentially Significant Impact
 ☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated
 ☒ No Impact

No Impact: The project site currently provides some migratory benefit as open space consisting primarily of non-native species associated with the abandoned golf course portion of the project site and provides riparian habitat that is isolated to an approximately 30-foot-wide band centered on Moosa Creek and running its entire length. This habitat would remain in place while the remainder of the project site would be restored to native riparian and upland habitat, increasing the ecological functions of the project site and its potential use as a local wildlife corridor. The project site connects inland areas upstream of Moosa Creek to the San Luis Rey River regional wildlife corridor, which Moosa Creek connects to downstream of the project site. In addition, the project would be required to comply with the BMTA (see mitigation measure BIO#4 in response (a) above). As the Project would create native habitat and could increase migratory use of the Project site, the Project would not impact the movement of any native resident or migratory species.

- e) Conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources?

☐ Potentially Significant Impact
 ☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated
 ☒ No Impact

No Impact: The Project is located within the North County Multiple Species Conservation Program (MSCP) area Pre-Approved Mitigation Area. Restoration of the project site is compliant with local, regional, and state policies. Refer to the Ordinance Compliance Checklist for further information on consistency with any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional or state habitat conservation plan including Habitat Management Plans (HMP), Special Area Management Plans (SAMP), or any other local policies or ordinances that protect biological resources including the North County MSCP, Biological Mitigation Ordinance, Resource Protection Ordinance (RPO), or Habitat Loss Permit (HLP).

V. CULTURAL RESOURCES – Would the project:

- a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Less than Significant Impact: Based on an analysis of records and a survey of the property by a County of San Diego approved historian, Brian F. Smith, it has been determined that there are no impacts to historical resources because they do not occur within the project site. The results of the survey are provided in a Cultural Resources Study of a larger area encompassing the project site was prepared by Brian F. Smith & Associates (BFSA) in 2013 (BFSA 2013).

- b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

The Cultural Resources Study prepared by BFSA (BFSA 2013) included an analysis of the existing setting on the Project site as it pertains to cultural resources as well as a records search of previously recorded archaeological sites within one mile of the Project site, pedestrian surveys of the Project site, and consultation with the Native American Heritage Commission (NAHC) to determine whether any Native American sacred sites or locations of religious or ceremonial importance are known to be present within one-half mile of the project site. The records search and literature review indicated that two previously recorded cultural resource sites are located within one mile of the project site, and that there is a moderate potential for unrecorded cultural resources to be contained within the project Site due to known historic and prehistoric activities as well as previous discoveries in the surrounding area. No previous recorded cultural resource sites are located on the project site, and the Project would not impact any known cultural resource sites. The records search and consultation with the NAHC did not identify any known Native American cultural resources on or within one mile of the project Site. No additional

unrecorded cultural resources were identified during the pedestrian surveys of the project site.

The project site and the surrounding area have been disturbed by housing and road developments in the area. In addition, the Project site has been heavily disturbed by construction and maintenance activities related to the golf course including clearing, soil import and fill, grading, disking, and the construction of golf course features (i.e., earthen mounds). Despite the disturbed nature of the Project site, there remains the potential that previously unrecorded archaeological deposits could be present. Potential impacts to unknown archaeological resources would be reduced to less than significant with the implementation of the archaeological monitoring program and Treatment Agreement and Preservation Plan outlined in mitigation measures CUL-1 and CUL-2.

CUL-1:

Archaeological and Tribal Monitoring Program

- **Pre-Construction**

- a. Contract with a County approved archaeologist to perform archaeological monitoring and a potential data recovery program during all earth-disturbing activities. The Project Archaeologist shall perform the monitoring duties before, during and after construction.
- b. Pre-construction meeting to be attended by the Project Archaeologist and Luiseno Native American monitor to explain the monitoring requirements.

- **Construction**

- a. **Monitoring.** During the original cutting of previously undisturbed deposits, the Project Archaeologist and Luiseno Native American Monitor shall be onsite as determined necessary by the Project Archaeologist. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Project Archaeologist in consultation with the Luiseno Native American Monitor. Monitoring of the cutting of previously disturbed deposits will be determined by the Project Archaeologist in consultation with the Luiseno Native American Monitor.
- b. **Inadvertant Discoveries.** If during ground disturbance activities, unique cultural resources are discovered that were not assessed by the archaeological report and/or environmental assessment prior to project approval, the following procedures shall be followed:
 1. Both the Project Archaeologist and Luiseno Native American monitor have the authority to divert or temporarily halt ground disturbance operations in the area of the discovery.
 2. The Project Archaeologist shall contact the County Archaeologist and culturally-affiliated tribes as identified in the Treatment Agreement and Preservation Plan at the time of discovery.
 3. All ground disturbance activities within 100 feet of the discovered cultural resources shall be halted until a meeting is convened between the developer,

- the project archaeologist, tribal monitor(s), and the tribal representative(s) to discuss the significance of the find. Optionally, the County Archaeologist may attend the meeting to discuss the significance of the find.
4. After consultation with the developer, project archaeologist, tribal monitor(s), and tribal representative(s), a decision shall be made, with the concurrence of the County Archaeologist, as to the appropriate mitigation (documentation, recovery, avoidance, etc.) for the identified cultural resources.
 5. Construction activities shall not resume in the area of discovery until an agreement has been reached by all parties as to the appropriate mitigation. Work shall be allowed to continue outside of the buffer area and shall be monitored.
 6. Isolates and non-significant deposits shall be minimally documented in the field. The isolates and/or non-significant deposits shall be reburied onsite as identified in the Treatment Agreement and Preservation Plan.
 7. Treatment and avoidance of the newly discovered resources shall be consistent with the Treatment Agreement and Preservation Plan (CUL-2) entered into with the appropriate tribes. This may include avoidance of the cultural resources through project design, in-place preservation of cultural resources located in native soils and/or re-burial on the Project property so they are not subject to further disturbance in perpetuity.
 8. If cultural resources are identified, one or more of the following treatments, in order of preference, shall be employed:
 - a. Preservation in place of the Cultural Resources, if feasible. Preservation in place means avoiding the resources, leaving them in place where they were found with no development affecting the integrity of the resources.
 - b. Reburial of the resources on the project property. The measures for reburial shall include, at least, the following:
 - Measures and provisions to protect the future reburial area from any future impacts in perpetuity.
 - Reburial shall not occur until all legally required cataloging and basic recordation have been completed, with an exception that sacred items, burial goods and Native American human remains are excluded.
 - Any reburial process shall be culturally appropriate.
 - Listing of contents and location of the reburial shall be included in the confidential appendix of the Monitoring Report.
 - The Monitoring Report shall be filed with the County under a confidential cover and is not subject to Public Records Requests.
 - c. If preservation in place or reburial is not feasible, a Research Design and Data Recovery Program shall be prepared by the Project Archaeologist in consultation with the Tribe and Luiseno Native American monitor, and approved by the County Archaeologist prior to implementation. There shall be no destructive or invasive testing on sacred items, burial goods and Native American human remains. Results concerning finds of any inadvertent discoveries shall be included in the Monitoring Report.

Pursuant to Calif. Pub. Res. Code § 21083.2(b) avoidance is the preferred method of preservation for archaeological resources and cultural resources. If the landowner and the Tribe(s) cannot agree on the significance or the mitigation for

the archaeological or cultural resources, these issues will be presented to the Planning & Development Services Director for decision. The Community Development Director shall make the determination based on the provisions of the California Environmental Quality Act with respect to archaeological resources, recommendations of the project archeologist and shall take into account the cultural and religious principles and practices of the Tribe.

c. Human Remains:

1. The Property Owner or their representative shall contact the County Coroner and the PDS Staff Archaeologist.
2. Upon identification of human remains, no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin. If the human remains are to be taken offsite for evaluation, they shall be accompanied by the Luiseno Native American monitor.
3. If the remains are determined to be of Native American origin, the Native American Heritage Commission (NAHC) shall immediately contact the Most Likely Descendant (MLD).
4. The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98 has been conducted.
5. The MLD may with the permission of the landowner, or their authorized representative, inspect the site of discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site.
6. Public Resources Code §5097.98, CEQA §15064.5 and Health & Safety Code §7050.5 shall be followed in the event that human remains are discovered.

d. **Fill Soils.** The Project Archaeologist and Luiseno Native American monitor shall evaluate fill soils to determine that they are clean of cultural resources.

e. **Monthly Reporting.** The Project Archaeologist shall submit monthly status reports to the Director of Planning & Development Services starting from the date of the Notice to Proceed to termination of implementation of the archaeological monitoring program. The report shall briefly summarize all activities during the period and the status of progress on overall plan implementation. Upon completion of the implementation phase, a final report shall be submitted describing the plan compliance procedures and site conditions before and after construction.

- **Rough Grading**
 - **Monitoring Report.** Upon completion of Rough Grading, a monitoring report shall be prepared identifying whether resources were encountered. A copy of the monitoring report shall be provided to the South Coastal Information Center and any culturally-affiliated tribe who requests a copy.
 - **Final Grading**
 - **Final Report.** A final report shall be prepared substantiating that earth-disturbing activities are completed and whether cultural resources were encountered. A copy of the final report including DPR forms and daily monitoring logs shall be submitted to the South Coastal Information Center and any culturally-affiliated tribe who requests a copy.
 - **Cultural Material Conveyance.**
 - The final report shall provide evidence that all Native American cultural materials in order of preference have been conveyed as follows:
 - (1) Evidence that all prehistoric materials collected during the archaeological monitoring program have been reburied onsite.
- Or
- (2) Evidence that all prehistoric materials collected during the grading monitoring program have been repatriated to a Native American group of appropriate tribal affinity and shall be accompanied by payment of the fees necessary, if required. Evidence shall be in the form of a letter from the Native American tribe to whom the cultural resources have been repatriated identifying that the archaeological materials have been received.
 - The final report shall include evidence that all historic materials have been curated at a San Diego curation facility that meets federal standards per 36 CFR Part 79.

If no cultural resources are discovered, a Negative Monitoring Report must be submitted stating that the archaeological monitoring activities have been completed. Grading Monitoring Logs must be submitted with the negative monitoring report.

CUL-2:

Cultural Resources Treatment Agreement and Preservation Plan

INTENT: In order to mitigate for impacts to Traditional Cultural Properties, develop and enter into a Cultural Resources Treatment Agreement and Preservation Plan with culturally-affiliated Tribes. **DESCRIPTION OF REQUIREMENT:** A single Cultural Resources Treatment Agreement and Preservation Plan shall be developed between the applicant or their representative, the County of San Diego, and culturally-affiliated Tribes. The Cultural Resources Treatment Agreement and Preservation Plan shall be reviewed

and agreed to by the County prior to final signature and authorization. The Cultural Resources Treatment Agreement and Preservation Plan shall include but is not limited to the following:

- a. Parties entering into the agreement and contact information.
- b. Responsibilities of the Property Owner or their representative, Principal Investigator, archaeological monitors, Luiseno Native American monitors, and consulting tribes .
- c. Requirements of the Archaeological Monitoring Program including unanticipated discoveries. The requirements shall address grading and grubbing requirements including controlled grading and controlled vegetation removal in areas of cultural sensitivity, and analysis of identified cultural materials.
- d. Excavated soils. Soils are to stay onsite. Consultation with the culturally-affiliated tribes shall occur should excavated soils need to be exported offsite.
- e. Treatment of identified Native American cultural materials. Any identified Native American cultural materials with the exception of Native American human remains and associated grave goods (described in item g below) are to be reburied onsite.
- f. Deed restriction. Details of the requirement for a deed restriction for reburial of identified Native American cultural materials. The requirements shall address protection of Native American cultural materials, access, and responsibilities for management and maintenance of the open space.
- g. Treatment of Native American human remains and associated grave goods.
- h. Confidentiality of cultural information including location and data.
- i. Negotiation of disagreements should they arise during the implementation of the Agreement and Preservation Plan.
- j. Regulations that apply to cultural resources that have been identified or may be identified during project construction.

DOCUMENTATION: A copy of the implemented agreement shall be submitted to the [PDS, PPD] for approval. **TIMING:** Prior to any clearing, grubbing, trenching, grading, or any land disturbances. **MONITORING:** The [PDS, PPD] shall review the implemented agreement for compliance this condition.

- c) Disturb any human remains, including those interred outside of dedicated cemeteries?

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less than Significant Impact with Mitigation Incorporated: The Cultural Resources Study (BFSA 2013) determined that the Project site does not include any formal cemeteries or known archaeological sites that include interred human remains. There remains a low potential that previously undiscovered human remains could be incidentally discovered during construction activities, but the potential impact would be reduced to less than significant with the implementation of mitigation measure CUL-1 and CUL-2.

VI. ENERGY USE – Would the project:

- a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Less than Significant Impact: The Project would result in the use of energy resources during the construction phase. Construction phase activities include demolition, site preparation, materials hauling, regrading, and plant installation. Monitoring phase activities include restoration monitoring and maintenance for up to a five-year monitoring period. During construction, energy would be consumed in the form of petroleum-based fuels for vehicle and equipment use. Diesel fuel would be consumed by heavy-duty equipment for the purposes of site clearing, grading/regrading, planting, and materials transfer. For the duration of Project construction, worker travel to and from the project site would result in the consumption of vehicular unleaded gasoline fuel and potentially diesel fuel. This energy demand would be temporary, limited, and cease upon completion of construction. Construction activities are not anticipated to involve consumption of natural gas.

Construction would be conducted in compliance with local, state, and federal regulations (e.g., USEPA and CARB engine emissions standards, which require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption, and limitations on engine idling times, etc.). Compliance with these regulations would reduce short-term energy demand during the Project's construction to the extent feasible. As such, project construction would not represent a substantial increase in demand for local or regional energy supplies. Therefore, construction would not result in a wasteful or inefficient use of energy.

Ongoing maintenance and monitoring efforts would be negligible after the five-year monitoring period. Once construction, monitoring, and maintenance activities are complete and the restored habitat is established there would be nominal energy use associated with the project site in the form of personal vehicles used to drive to the site for continued periodic monitoring, equipment usage during periodic vegetation cleanup, and similar activities.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less than Significant Impact: State and local agencies regulate the use and consumption of energy through various policies and programs. Assembly Bill 32 (AB 32) (the California Global Warming Solutions Act of 2006), which seeks to reduce the effects of greenhouse gas (GHG) emissions, helped establish the foundation for most of the state regulations intended to reduce energy use and GHG emissions. SB 32 (Amendments to the California Global Warming Solutions Action of 2006) extends California's GHG reduction programs beyond 2020 to 2030. SB 32 amended the Health and Safety Code to include Section 38566, which contains language to authorize CARB to achieve a statewide GHG emission reduction of at least 40 percent below 1990 levels by no later than December 31, 2030. SB 32 codified the targets established by EO B-30-15 for 2030, which set the next interim step in the State's continuing efforts to pursue the long-term target expressed in EO B-30-15 of 80 percent below 1990 emissions levels by 2050

The Project would require energy use during the construction phase and subsequent monitoring phases. Energy would be consumed in the form of petroleum-based fuels for vehicle and equipment use. This energy demand would be temporary, limited, and would not conflict with state or local plans for energy efficiency.

VII. GEOLOGY AND SOILS – Would the project:

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

- i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

No Impact: The Project is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, Fault-Rupture Hazards Zones in California, or located within any other area with substantial evidence of a known fault. Although all of California is seismically active, no buildings or structures are proposed as part of the restoration work. Therefore, there would be no impact from the exposure of people or structures to adverse effects from a known fault-rupture hazard zone as a result of this Project.

ii Strong seismic ground shaking?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

No Impact: The Project does not propose any buildings or other structures. Therefore, there would be no impact from the exposure of people or structures to adverse effects from strong seismic ground shaking as a result of this Project.

iii Seismic-related ground failure, including liquefaction?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

No Impact: The Project site is within a "Potential Liquefaction Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. The Project does not include any building of structures or structural fills. Therefore, there would be no impact from the exposure of people or structures to adverse effects from a known area susceptible to ground failure, including liquefaction.

iv Landslides?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

No Impact: The Project site is not within a "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. Landslide Susceptibility Areas were developed based on landslide risk profiles included in the Multi-Jurisdictional Hazard Mitigation Plan, San Diego, CA (URS, 2004). Landslide risk areas from this plan were based on data including steep slopes (greater than 25%); soil series data (SANDAG based on U.S. Geological Survey [USGS] 1970s series); soil-slip susceptibility from USGS; and Landslide Hazard Zone Maps (limited to the western portion of the County) developed by the California Department of Conservation, Division of Mines and Geology (DMG). Also included within Landslide Susceptibility Areas are gabbroic soils on slopes steeper than 15% in grade because these soils are slide prone. The Project is not located within an identified Landslide Susceptibility Area, the geologic environment has a low probability to become unstable, and no buildings or other structures are proposed. Therefore, there would be no impact from the exposure of people or structures to adverse effects from landslides as a result of this Project.

b) Result in substantial soil erosion or the loss of topsoil?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less than Significant Impact: The majority of soils on the Project site are identified as Tujunga sand, 0 to 5 percent slopes (TuB), which has a soil erodibility rating of “severe”, and a “negligible” runoff class or Grangeville fine sandy loam, 0 to 2 percent slopes (GoA), which has a soil erodibility rating of “severe” and a “very low” runoff class as indicated by the Soil Survey for the San Diego Area, prepared by the US Department of Agriculture, Soil Conservation and Forest Service dated December 1973.

However, the Project would not result in substantial soil erosion or the loss of topsoil because the Project would comply with the County Watershed Protection, Stormwater Management, and Discharge Control Ordinance (WPO) (Ordinance No. 10410), which includes the Best Management Practice (BMP) Design Manual and County Grading Ordinance (Ordinance No. 10224). Compliance with these ordinances would result in reduced soil erosion, would limit alteration to existing regional drainage patterns, and would prohibit development of steep slopes. Additionally, the Project would implement a Storm Water Pollution Prevention Plan (SWPPP) and standard construction BMPs to prevent fugitive sediment. Once the restored habitat is established, the Project would be vegetated. Therefore, the impacts associated with substantial soil erosion or the loss of topsoil would be limited to a less than significant level.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less than Significant Impact: As indicated in response VII (a) (iv): Geology and Soils, the Project site is not located within a “Landslide Susceptibility Area” as identified in the County Guidelines for Determining Significance for Geologic Hazards. Lateral spreading is a principal effect from liquefaction. For further information regarding liquefaction and lateral spreading, refer to response VII (a) (iii): Geology and Soils. Additionally, no structures are proposed as part of the Project. Therefore, the Project would have less than significant impacts from landslides, lateral spreading, subsidence, liquefaction, or collapse.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

No Impact: The Project does contain expansive soils as defined by Table 18-I-B of the Uniform Building Code (1994) pursuant to the Soil Survey for the San Diego Area (U.S. Department of Agriculture, Soil Conservation and Forest Service, 1973). The soils on-site include Tujunga sand (TuB), Fallbrook sandy loam (FaD2), Placentia sandy loam (PeD2), Grangeville fine sandy loam (GoA), Fallbrook-Vista sandy loams (FvE), and Visalia sandy loam (VaA). These soils have a shrink-swell behavior ranging from low to high. However, a majority of the Project site is TuB and GoA, which have low shrink-swell behavior and represent no substantial risks to life or property. Additionally, no structures are proposed as part of the Project. Therefore, the Project would not create a substantial risk to life or property.

- e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

No Impact: The Project does not propose any septic tanks or alternative wastewater disposal systems because no wastewater would be generated. Temporary construction needs would be satisfied by using portable facilities. Therefore, the Project would have no impact related to the use of septic tanks or alternative wastewater disposal systems.

- f) Directly or indirectly destroy a unique paleontological resource or site or geologic feature?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Less than Significant Impact with Mitigation Incorporated: The Project is located entirely on cretaceous plutonic and quaternary alluvium geological formations and a review of the County's Paleontological Resources Potential and Sensitivity Map indicates that the Project site has zero to low potential for containing paleontological resources (County of San Diego, 2009). In areas with low potential for containing paleontological resources (e.g. quaternary alluvium), the grading/excavation contractor would perform monitoring per the County guidelines (County of San Diego, 2009). Excavating into undisturbed ground beneath the soil horizons may cause a significant impact if unique paleontological resources are encountered. The Project would excavate into the substratum (e.g. not only fill) or soil horizons during the grading activities; however, this potential impact would be reduced to a less than significant level with the implementation of mitigation measure GEO-1.

PALEO#GR-1 & PALEO#GR-2: The Project contractor shall monitor for paleontological resources during the initial cutting, grading, or excavation of undisturbed substratum. If a fossil of greater than twelve inches in any dimension, including circumference, is encountered during excavation or grading, all excavation operations in the area where

the fossil was found shall be suspended immediately, the County Department of Planning shall be notified, and a qualified paleontologist shall assess the significance of the find. If the fossil is deemed to be significant, the qualified paleontologist shall oversee the salvage program, including salvaging, cleaning, and curating the fossil(s), as well as documenting the find.

VIII. GREENHOUSE GAS EMISSIONS – Would the project:

- a) Generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less than Significant Impact: As noted under response VI.b, AB 32 set forth California's first GHG target through adoption of the 2008 Scoping Plan and called on the state to reduce emissions to 1990 levels by 2020. In 2017, the State adopted the Climate Change Scoping Plan Update which indicated that the state was on track for achieving the AB 32 goals and incorporated new GHG emissions reduction goals contained in SB 32, which extended the goals of AB 32 and set a 2030 goal of reducing emissions 40 percent from 2020 levels. The SB 32 targets double the rate of emissions reductions outlined in AB 32. To address these updated targets, project-level screening thresholds have been adopted by various agencies across the state.

In response to AB 32, the California Air Pollution Control Officers Association (CAPCOA) white paper titled "CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act," provides a current methodology used for jurisdictions across the state to identify a screening level for GHG emissions (CAPCOA 2008). The CAPCOA guidance states that projects should be screened to determine if their associated GHG emissions exceed 900 MT CO₂e. The CAPCOA threshold was developed to ensure capture of 90 percent or more of likely future discretionary developments. The objective was to set the emissions threshold low enough to capture a substantial fraction of future development while setting the emission threshold high enough to exclude small development projects that would contribute a relatively small fraction of cumulative statewide GHG emissions. Although the CAPCOA threshold was developed based on AB 32 State targets, the aggressive project-level GHG emission capture rate of 90 percent would still be applicable to the reduction targets set by SB 32.

As compared to similar mass emissions thresholds adopted by other regional air districts the CAPCOA 900 MTCO₂e threshold is relatively conservative and could be used to support cumulative impact determination beyond 2020. In April 2020, the Sacramento Metropolitan Air Quality Management District (SMAQMD) published updated project screening levels and determined that projects estimated to generate less than 1,100

MTCO_{2e} per year would not result in a significant, cumulative impact.² This threshold was developed to demonstrate compliance with the statewide reduction targets in 2030 and the threshold was determined by SMAQMD to capture 98 percent of total GHG emissions.

Thus, the CAPCOA threshold of 900 MTCO_{2e} represents a more stringent screening level than has been approved by other air districts in compliance with 2030 statewide reduction targets. Due to the aggressive GHG emission capture rate, the CAPCOA threshold would still act as a viable threshold to reduce project GHG emissions proposed after 2020 and meet SB 32 targets.

Because the County has not developed its own numeric GHG significance threshold, it utilizes the interim screening threshold of 900 MT CO_{2e} per year in accordance with CAPCOA white paper. The screening level does not indicate impact significance; rather, it is intended to be used to screen out smaller projects that do not generate substantial amounts of GHG emissions and allows regulatory and discretionary actions to focus on the more significant sources of GHG emissions. If a project exceeds this threshold, a climate change analysis would need to be completed to analyze any potential project-specific impact. The CAPCOA white paper suggests that projects that emit less than 900 MT CO_{2e} per year would not likely be considered cumulatively considerable and would not interfere with the ability of the state to achieve its GHG reduction targets. Applying the CAPCOA screening level to this project is valid and adequate as it Sets a stringent threshold while meeting State reduction targets.

The Project would only generate GHG emissions during the construction phase, consisting of demolition, site preparation, regrading, and plant installation. GHG emissions associated with ongoing maintenance and monitoring efforts would be negligible and would cease after the 5-year monitoring period.

Construction-related GHG emissions would be generated by sources such as heavy-duty off-road equipment, trucks hauling materials to the project site, and worker commute vehicles. Construction-related emissions associated with typical construction activities were modeled using CalEEMod (see Section III: Air Quality and Air Quality Calculations for details). The total annual construction emissions are estimated at 667 MT CO_{2e} (Burns & McDonnell 2020). Construction emissions may be amortized over the operational life of a project, which can conservatively be estimated at 30 years (SCAQMD 2008). When amortized over the 30-year life of the Project, annual construction emissions would be approximately 22.2 MT CO_{2e} per year, which is below the 900 MT CO_{2e} screening threshold.

² Sacramento Metropolitan Air Quality Management District (SMAQMD). 2020. Greenhouse Gas Thresholds for Sacramento County. Available: <http://www.airquality.org/LandUseTransportation/Documents/SMAQMDGHGThresholds2020-03-04v2.pdf>. Accessed. May 17, 2021.

As a native habitat restoration project, there would not be any long-term operational sources of GHG emissions created on site after the 5-year monitoring period is completed. Carbon dioxide is absorbed by trees and plants through photosynthesis and stored as carbon in biomass in tree trunks, branches, foliage and roots and soils (EPA 2008) Thus, the plant material in habitats installed on the Project site would increase vegetative carbon sequestration by trapping respired carbon in the vegetative matter and soil preventing its release into the atmosphere and resulting in a net benefit to the environments and climate from a GHG perspective. Therefore, the Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less than Significant Impact: In 2006, the State of California passed the Global Warming Solutions Act of 2006, commonly referred to as AB 32, which set the GHG emissions reduction goal for the state into law. The law requires that by 2020, state emissions must be reduced to 1990 levels by reducing GHG emissions from significant sources via regulation, market mechanisms, and other actions. SB 32 (Amendments to the California Global Warming Solutions Action of 2006) extends California's GHG reduction programs beyond 2020. SB 32 amended the Health and Safety Code to include Section 38566, which contains language to authorize CARB to achieve a statewide GHG emission reduction of at least 40 percent below 1990 levels by no later than December 31, 2030. SB 32 codified the targets established by EO B-30-15 for 2030, which set the next interim step in the State's continuing efforts to pursue the long-term target expressed in EO B-30-15 of 80 percent below 1990 emissions levels by 2050. With respect to future GHG targets under SB 32 and Executive Order S-3-05, CARB has also made clear its legal interpretation that it has the requisite authority to adopt whatever regulations are necessary, beyond the AB 32 horizon year of 2020, to meet the SB 32 40% reduction target by 2030 and the Executive Order S-3-05 80% reduction target by 2050. This legal interpretation by an expert agency provides evidence that future regulations will be adopted to continue the trajectory toward meeting these future GHG targets.

Senate Bill (SB) 375, passed in 2008, links transportation and land use planning with global warming. It requires the California Air Resources Board (CARB) to set regional targets for the purpose of reducing GHG emissions from passenger vehicles. Under this law, if regions develop integrated land use, housing, and transportation plans that meet SB 375 targets, new projects in these regions can be relieved of certain review requirements under the California Environmental Quality Act (CEQA). SANDAG has prepared a Sustainable Communities Strategy (SCS) and the 2050 Regional Transportation Plan (RTP) which are elements of the San Diego Forward: The Regional Plan. The strategy identifies how regional GHG reduction targets, as established by CARB, would be achieved through development patterns, transportation infrastructure investments, and/or transportation measures or policies that are determined to be

feasible. The 2050 RTP and SCS show that our region will meet or exceed GHG emissions reduction targets by using land in ways that make developments more compact, conserving open space, and investing in a transportation network that gives residents alternatives to driving alone. Although this Project is not directly related to our transportation system, this habitat restoration aligns with the SCS/RTP goal to protect sensitive habitat and open space and would not conflict with the SCS/RTP policies.

To implement state mandates to address climate change in local land use planning, local land use jurisdictions are generally preparing GHG emission inventories and reduction plans and incorporating climate change policies into local General Plans to ensure development is guided by a land use plan that reduces GHG emissions. The County General Plan incorporates policies related to climate change. For instance, the project is a carbon dioxide consuming landscape and maximizes the preservation of open spaces consistent with Policy LU-6.3 related to Conservation-Oriented Project Design, Policy LU-6.6 which promotes Integration of Natural Features into Project Design and Policy LU-6.9 which encourages Development Conformance with Topography. Furthermore, the project would implement strategies related to Policy COS-2.1 Protection, Restoration and Enhancement, Policy COS-2.2 Habitat Protection Through Site Design, Policy COS-3.1 Wetland Protection and Policy COS-14.11 Native Vegetation. These policies provide direction for individual development projects to reduce GHG emissions and help the County meet its GHG emission reduction targets.

As discussed in response VIII (a): Greenhouse Gas Emissions above, the Project's emissions would be below the 900 MT CO₂e per year screening level. Therefore, projects that do not exceed the bright-line threshold would have a nominal, and therefore less than cumulatively considerable, impact on GHG emissions. The Project's consistency with the policies discussed above would assist in meeting the County's contribution to GHG emissions reduction targets in California. As such, the Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG.

IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:

- a) Create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less than Significant Impact: Construction activities may require the use of limited quantities of hazardous materials such as fuels, solvents, lubricating fluids, and other common construction materials. As with any construction project, there is the potential for drips, leaks, and spills to occur during operation, maintenance, and refueling of construction equipment. However, the Project would implement a SWPPP and standard construction BMPs that would minimize the potential for accidental releases of

construction-related substances. The SWPPP would use BMP designs and practices identified in the California Stormwater Quality Association (CASQA) Stormwater BMP Handbook (Portal for Construction) (CASQA, 2019) during the construction process and the San Diego County BMP Design Manual (County of San Diego, 2019) for post-construction BMPs.

The project site contains four groundwater monitoring wells. To protect from any inadvertent disturbance to the groundwater level monitoring wells, the Project would be required to properly cap the well through a Well Destruction Permit obtained from the Department of Environmental Health prior to grading plan permit approval.

Demolition of former golf course infrastructure may involve the handling of material containing lead and asbestos. Prior to demolition, a Hazardous Building Materials Survey would be conducted including an asbestos-containing materials (ACMs) survey, a lead-containing surfaces (LCSs) survey of materials, visual identification and quantification of building materials potentially subject to the California Department of Toxic Substances Control (DTSC) Universal Waste Rule (UWR), and other potential hazardous building materials, as required for disposal. If necessary, abatement in accordance with federal, state, and local regulations, including, but not limited to California Code of Regulations (CCR) Title 22, Division 4.5, Chapter 11, Article 3, Section 66261.24 and SDAPCD Rules 361.140 – 361.156, would be required for ACMs and LCSs should be completed prior to demolition resulting in no potential for the accidental release of hazardous materials.

The Project would only involve the routine use, transport, and/or disposal of hazardous materials during the construction phase, consisting of demolition, site preparation, regrading, plant installation, and restoration. Once construction is complete, the Project would not routinely use, transport, and/or dispose of hazardous materials.

The reasonably foreseeable upset and accident conditions associated with the Project include potential spills and leaks of fuels, solvents, and lubricating fluids that could occur during construction. All storage, handling, transport, and disposal of potentially hazardous materials are regulated by the Environmental Protection Agency (EPA), the DTSC, and the County Department of Environmental Health, Hazardous Materials Division (HMD). The HMD is the designated Certified Unified Program Agency (CUPA) for the County and is therefore responsible for implementing the unified hazardous waste and hazardous material management and regulatory program. Any hazardous wastes that are produced would be managed in accordance with applicable regulations for the handling and storage of hazardous materials. preventing a significant hazard to the public or the environment.

- b) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Less than Significant Impact: One school, the Bonsall Elementary School, is within 0.25 mile of the Project site. However, the type and amount of hazardous materials that would be used during construction would not be considered acutely hazardous, and their use would not occur for an extended period of time in any one area. Demolition activities with potential hazards related to the release of ACMs, LCSs, or other hazardous materials would be conducted as noted in response IX (a): Hazards and Hazardous Materials listed above. Additionally, once construction of the project is complete and restored habitat is established, no hazardous or acutely hazardous materials would be stored onsite.

- c) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been subject to a release of hazardous substances and, as a result, would it create a significant hazard to the public or the environment?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

No Impact: Based on a Phase I Environmental Site Assessment (see the Phase I Environmental Site Assessment) completed for the project site in August 2017 (and updated to confirm current conditions in July 2020) by Advantage Environmental Consultants, LLC and in conformance with the scope and limitations of the American Society for Testing and Materials (ASTM) E 1527-13 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process as referenced in 40 CFR Part 312 (the All Appropriate Inquiries [AAI] Rule), the Project site has no evidence “recognized environmental conditions” (REC) as defined in the ASTM E 1527-13 Standard.

The Cortese List, Hazardous Waste and Substances Sites List, also known as the California Superfund, is a planning document used by the state and its various local agencies and developers to comply with CEQA requirements in providing information about the location of hazardous materials release sites. California Government Code section 65962.5 requires the California EPA to develop at least an annually updated Cortese List. The DTSC is responsible for a portion of the information contained in the Cortese List. Other state and local government agencies are required to provide additional hazardous material release information for the Cortese List. The list is maintained via DTSC’s Brownfields and Environmental Restoration Program, called EnviroStor. The EnviroStor database was checked as part of this analysis (CalEPA, 2018). In addition to EnviroStor, information was obtained from the online GeoTracker tool (State Water Resources Control Board, 2018).

The Project site is not currently identified or listed as a hazardous materials site, and therefore, the Project would not create a significant hazard to the public or the environment.

- d) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

<input checked="" type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

No Impact: The project site is located within the Airport Influence Area of Marine Corps Air Station Camp Pendleton. However, the Project is not located within an Airport Land Use Compatibility Plan (ALUCP), an airport safety zone, or a Federal Aviation Administration Notification Zone. Also, the Project would be unmanned (with the exception of limited maintenance activities) and does not propose construction of any structure equal to or greater than 150 feet in height, constituting a safety hazard to aircraft and/or operations from an airport or heliport. Therefore, the Project would not constitute a safety hazard for people residing or working in the area.

- e) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

Construction and operation activities would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

The following sections summarize the Project's consistency with applicable emergency response plans or emergency evacuation plans.

i. OPERATIONAL AREA EMERGENCY PLAN AND MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN:

No Impact: The Operational Area Emergency Plan is a comprehensive emergency plan that defines responsibilities, establishes an emergency organization, defines lines of communications, and is designed to be part of the statewide Standardized Emergency Management System. The Operational Area Emergency Plan provides guidance for emergency planning and requires subsequent plans to be established by each jurisdiction that has responsibilities in a disaster situation (Unified San Diego County Emergency Services Organization and County of San Diego, 2018). The Multi-Jurisdictional Hazard Mitigation Plan includes an overview of the risk assessment process, identifies hazards present in the jurisdiction, hazard profiles, and vulnerability assessments. The plan also identifies goals, objectives, and actions for each jurisdiction in the County, including all cities and the County unincorporated areas (County of San Diego Office of Emergency Services [OES] and San Diego County Unified Disaster Council [UDC], 2017). The Project construction and eventual operation (restored habitat) would not require rerouting of traffic or road closures that would impair emergency response services. The Project

would not interfere with this plan because it would not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out.

ii. SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY
RESPONSE PLAN

No Impact: The Project would not interfere with the San Diego County Nuclear Power Station Emergency Response Plan due to the location of the Project, location of the plant, and the specific requirements of the plan. The emergency plan for the San Onofre Nuclear Generating Station includes an emergency planning zone within a 10-mile radius. The Project is outside this zone, and as such would not impact emergency plan response or evacuation.

iii. OIL SPILL CONTINGENCY ELEMENT

No Impact: The Project would not interfere with the Oil Spill Contingency Element because it is not located along the coastal zone or coastline.

iv. EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY
SHORTAGE RESPONSE PLAN

No Impact: The Project would not interfere with the Emergency Water Contingencies Annex and Energy Shortage Response Plan because it does not propose altering major water or energy supply infrastructure, such as the California Aqueduct.

v. DAM EVACUATION PLAN

Less than Significant Impact: The Project site is located within the Turner dam inundation zone. However, as a habitat restoration project that would not involve the construction of occupied structures, it would not cause a population increase and would not impact the surrounding road systems. As such, the Project would have a less than significant impact on the Dam Evacuation Plan.

f) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less than Significant Impact: The Project site is located within a County-identified Urban-Wildland Interface Zone, which is defined as an area where development is in proximity to open space or lands with native vegetation and habitat that are prone to brush fires. Based on the California Department of Forestry and Fire Protection (CAL FIRE) adopted Fire Hazard Severity Zone Viewer (January 2020), the Project site is primarily in the Moderate to High Fire Hazard Severity Zones (FHSZ), with a small portion in the Very High FHSZ. However, the Project would not expose people or structures to a significant

risk of loss, injury, or death involving wildland fires because the Project would comply with the regulations relating to emergency access, water supply, and defensible space specified in the Consolidated Fire Code for the 16 Fire Protection Districts in the County. Additionally, the Project would avoid changes to brush management zones set up to protect the nearby residential development. No buildings or structures are proposed as part of the restoration work.

The Project site is located within the jurisdiction of the North County Fire Protection District of San Diego County. The nearest fire station (Station 5) is located approximately 1.3 miles from the project site.

The Project would not alter the emergency access or water supply currently at the Project site; therefore, the Project is not expected to expose people or structures to a significant risk of loss, injury, or death involving hazardous wildland fires.

- g) Propose a use, or place residents adjacent to an existing or reasonably foreseeable use that would substantially increase current or future resident's exposure to vectors, including mosquitoes, rats or flies, which are capable of transmitting significant public health diseases or nuisances?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

No Impact: The Project site currently has year-round open ponds with standing water, which may be a source of vectors (including mosquitos). The restoration would remove the open ponds with standing water; however, the restored habitat would not result in a significant change to current conditions. Additionally, the Project does not involve, or support uses that would produce or collect animal waste, such as equestrian facilities, agricultural operations (chicken coops, dairies etc.), solid waste facilities, or other similar uses. Therefore, the Project would not substantially increase current or future resident's exposure to vectors, including mosquitoes, rats, or flies.

X. HYDROLOGY AND WATER QUALITY – Would the project:

- a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less than Significant Impact: The Project is a habitat restoration improvement for the purpose of re-establishing biological habitat on-site. Once constructed, the Project would not substantially degrade surface or groundwater quality. Construction activities related to the Project have a limited potential to generate pollutants that could degrade surface or groundwater quality. However, the Project would be required to comply with the County

Watershed Protection Ordinance and a project-specific SWPPP would be prepared and implemented in accordance with Order No. 2009-009-DWQ, National Pollutant Discharge Elimination System (NPDES) Order CAS000002 Construction General Permit (CGP). The SWPPP would identify specific BMPs to be followed during the construction phase that are in accordance with the CASQA Stormwater BMP Handbook (CASQA, 2019) and are designed to limit potential pollutants during construction to the maximum extent practical. The proposed BMPs would be designed consistent with regional surface water and stormwater planning guidelines, the Watershed Protection Ordinance (Section 67.806 and 67.809), the San Diego County BMP Design Manual (County of San Diego, 2019) and MS 4 Permit, which have been established to improve overall water quality in County watersheds.

These BMPs would include but are not limited to the implementation of erosion control; sediment control; good site management including waste management, non-stormwater management, and run-on and run-off control; and active/passive sediment treatment systems where applicable. Once constructed, the Project does not propose any long-term discharge of pollutants and would not substantially degrade surface or groundwater quality. The implementation of BMPs and compliance with the SWPPP during the construction phase of the Project would limit the potential to substantially degrade surface or groundwater quality.

- b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Less than Significant Impact: The project would not use any groundwater resources. The Project would require municipal water by water trucks for dust control measures during grading and may require municipal water usage for temporary irrigation during the maintenance/monitoring phase of the project. Once the vegetation is established, the project would rely on natural hydrology (rainfall and groundwater). Therefore, the Project would not substantially decrease groundwater supplies, and would not interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Planned restoration activities would consist of regrading the area adjacent to (but outside of) Moosa Creek and removing approximately 4.5 acres of existing infrastructure (tennis courts, parking lots, golf course features, etc.) to establish and/or enhance riparian habitats. As such, the Project would remove existing impervious surfaces that currently limit groundwater infiltration and no new surfaces or structures would be constructed on the project site that could alter drainage in a way that would interfere with groundwater recharge.

- c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less than Significant Impact: The Project is a habitat restoration improvement for the purpose of re-establishing biological resources on-site. Planned restoration activities would consist of regrading the area adjacent to Moosa Creek and removing approximately 4.5 acres of existing infrastructure (tennis courts, parking lots, golf course features, etc.) to establish and/or enhance riparian habitats. The removal of existing infrastructure would lead to a reduction of impervious surfaces on the Project site, and no new impervious surfaces would be installed. Grading activities adjacent to Moosa Creek would not substantially alter drainage patterns in a manner that would result in substantial erosion or siltation. Revegetation of the riparian habitats would likely reduce erosion and siltation once construction is complete. There is a limited potential for increased erosion or siltation on the Project site during the construction phase of the Project. However, implementation of BMPs and compliance with the SWPPP and the CASQA Stormwater BMP Handbook would limit fugitive sediment, erosion, and siltation during construction activities such as grading and earth moving. The Project would comply with the County Watershed Protection Ordinance and Grading Ordinance, which would ensure that exposed soils are stabilized, existing drainage patterns are not altered, and steep slopes would not be developed by the Project.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less than Significant Impact: Due to the nature of the Project as a riparian habitat restoration, a large portion of the Project site is located within the FEMA Special Flood Hazard Area and Department of Public Works floodplain subject to inundation by the 100-year flood. The creek and surrounding floodplain area have been heavily impacted by past development including construction and maintenance activities related to the golf course. The removal of existing infrastructure related to the golf course would reduce impervious surfaces on the project site, and no new impervious surfaces would be installed. Many of these impervious surfaces, including golf cart paths and manmade berms, are located within the floodplain area. The removal of these features as well as grading and revegetation of the riparian and floodplain areas adjacent to Moosa Creek would help re-establish the floodplain function and would reduce the rate of surface runoff and flooding on- or off-site. The Project would enhance floodplain connectivity and function and would not substantially increase surface runoff or potential for flooding. The project is required to obtain a Letter of Map Revision (LOMR) to the satisfaction of FEMA and Department of Public Works. In addition, the Project is not anticipated to require a Conditional Letter of Map Revision, however if required, it would be obtained to the

satisfaction of FEMA and the Department of Public Works as a Project condition of approval.

- iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Less than Significant Impact: The Project would not create or contribute runoff water which would exceed the capacity of planned stormwater drainage systems or provide additional sources of polluted runoff. See response X (c) (ii): Hydrology and Water Quality.

- iv. Impede or redirect flood flows?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Less than Significant Impact: Due to the nature of the Project as a riparian habitat restoration, a large portion of the Project site is located within the FEMA Special Flood Hazard Area and Department of Public Works Floodplain subject to inundation by the 100-year flood. The creek and surrounding floodplain area have been heavily impacted by past development including construction and maintenance activities related to the golf course, as well as road development near the stretches of Moosa Creek upstream from the Project site. The removal of existing infrastructure related to the former golf course would reduce impervious surfaces on the Project site, and no new impervious surfaces would be installed. Enhancement of the riparian area through grading and revegetation would not impede or redirect flood flows, and the course of the main channel of Moosa Creek would not be altered. The project is required to obtain a Letter of Map Revision (LOMR) to the satisfaction of FEMA and Department of Public Works. In addition, the Project is not anticipated to require a Conditional Letter of Map Revision, however if required, it would be obtained to the satisfaction of FEMA and the Department of Public Works as a Project condition of approval.

- d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

- i. FLOOD HAZARD

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Less than Significant Impact: Due to the nature of the Project as a riparian habitat restoration, a large portion of the project site is located within the FEMA Special Flood Hazard Area and Department of Public Works floodplain subject to inundation by the 100-year flood. Portions of the project site could be inundated by flood, but there is a very low risk of pollutants being released because there would be no pollutant sources, structures, or people on the project site after the construction phase is completed. During construction, compliance with the SWPPP and implementation of sediment control BMPs would limit the potential impact of soil runoff in the case of flood. In addition, floodplain enhancements associated with the Project would likely reduce the potential for harmful flooding on- or off-site once construction is complete.

ii. TSUNAMI

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

No Impact: The project site is not located within a tsunami inundation zone and is more than 10 miles from the Pacific Ocean. The Project would also not have any pollutant sources stored on site; therefore, no impact would occur.

iii. SEICHE

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less than Significant Impact: The project site is located within the dam inundation zone for Turner Dam (managed by the Valley Center Municipal Water District), located approximately 9 miles to the southeast of the project site at the outlet of Turner Lake near the upper reach of Moosa Creek (California Department of Water Resources Dam Inundation Map, 2020). In the case of a seiche overtopping Turner Dam, the project site could become inundated as floodwaters flow downstream through Moosa Canyon. However, the Project is a habitat restoration project and no structures or sources of pollutants would be on the project site once the construction phase is completed. During construction, compliance with the SWPPP and implementation of sediment control BMPs would limit the potential impact of soil runoff in the case of inundation due to seiche.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

No Impact: The California State Water Resources Control Board divides the state into nine separate management basins for regional rulemaking and regulations in regard to water quality. The project site falls within the San Diego Basin and is therefore subject to

the regulations set forth in the Water Quality Control Plan (WQCP) for the San Diego Basin. As a habitat restoration project, the Project would not conflict with or obstruct any of the goals, plans, or policies set forth in the WQCP.

The Sustainable Groundwater Management Act (SGMA) is a three-bill legislative package signed into law in 2014 that provides a framework for sustainable groundwater management throughout the State of California. The SGMA identifies medium- and high-priority groundwater basins and requires them to provide Groundwater Sustainability Plans to guide long-term management. The project site is located within the San Luis Rey Valley Groundwater Basin, and more specifically the Lower San Luis Rey Valley Groundwater Subbasin. The Lower San Luis Rey Valley Groundwater Subbasin is considered low-priority and is not subject to the requirements of the SGMA. Therefore, the Project would not conflict with or obstruct the implementation of a sustainable groundwater management plan.

XI. LAND USE AND PLANNING – Would the project:

a) Physically divide an established community?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

No Impact: The project site is a former golf course and does not feature any existing residential or commercial development. Residences occur on all sides of the project site. Restoration of the riparian habitats on-site would occur where the golf course fairway and greens were sited. No existing homes or urban uses would be removed as part of the Project. Therefore, the Project would not physically divide an established community.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

No Impact: The project site is designated as open space in both the County General Plan and Bonsall Community Plan. In addition, the project site is situated on property that is identified as a Pre-Approved Mitigation Area (PAMA) in the North County Segment of the Draft North County MSCP area Pre-Approved Mitigation Area, as noted under response IV (e): Biological Resources. The Project would be consistent with the County Open Space (COS) Policy -1.1.1 because it would preserve and enhance areas of critical habitat identified under the MSCP in their natural state. It would also implement Policy COS-1.1.4 by being compatible with adjacent natural preserves, such as the San Luis Rey River Park and the associated sensitive habitat areas. The habitat restoration

improvements would also be consistent with Policy COS-1.1.6, which encourages development to plant an appropriate variety of trees to stabilize soil conditions and contribute to atmospheric oxygen production. The Project would be consistent with the County's goals with regard to plant and animal habitats by encouraging the protection of all sensitive lands and habitat on site, as identified by federal, state, and County guidelines such as oak and willow riparian, as noted in Policy COS-1.3.1 and Policy COS-1.3.3. The proposed floodplain improvements would be consistent with County policies regarding floodplains and watercourses being preserved in their natural state, including Policies COS-1.5.1 and COS-1.5.2. Finally, the project site is located within the San Luis Rey River Park Master Plan study area. Implementation of habitat restoration would enhance the open space and protect the San Luis Rey River, located downstream of the project site. The Project would have beneficial effects on floodplain and biological resources contained along the on-site reach of Moosa Creek and its surroundings and would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

XII. MINERAL RESOURCES – Would the project:

- a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Less than Significant Impact: The Project site has been classified by the California Department of Conservation – Division of Mines and Geology as an area of “Potential Mineral Resource Significance” (MRZ-3) with alluvium that contains known mineral deposits that may qualify as mineral resources. However, no active mining has occurred on-site or in the immediate project area. The project site is surrounded by developed land uses including village residential and semi-rural residential land uses, as well as open space for recreation and rural lands, which are incompatible with future extraction of mineral resources on the project site. Therefore, implementation of the Project would not result in the loss of availability of a known mineral resource that would be of value since the mineral resource has already been lost due to incompatible land uses.

- b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Less than Significant Impact: The project site is located within 1,300 feet of an area that has MRZ-2 designated lands, which are areas underlain by mineral deposits with significant measured or indicated resources. However, there are no active mines within 1,300 feet of the project site and various residential land uses and the Bonsall Elementary School surround the MRZ-2 designated land, which are incompatible with future

extraction of mineral resources on or near the project site. Therefore, no potentially significant loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan would occur as a result of the Project.

XIII. NOISE – Would the project result in:

- a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less than Significant Impact: The following discussion is based on a Noise Analysis prepared by Eilar Associates, Inc., dated July 20, 2020. The Noise Element prohibits the implementation of a project that can result in an exposure of any on- or off-site, existing, or reasonably foreseeable future Noise Sensitive Land Use (NSLU) to exterior or interior noise in excess of the noise standards. The Project is also subject to the Noise Ordinance which regulates the operational and temporary construction noise.

The primary source of noise generated by the Project at existing NSLUs (i.e., residences) would be created by temporary construction activities, as no permanent operational noise sources would be present once restoration, monitoring and maintenance activities are complete. Therefore, this analysis is focused on construction-related noise.

The County Noise Ordinance, Section 36.408, restricts construction activity to the hours of 7 AM to 7 PM on Mondays through Saturdays. Construction is prohibited on Sundays and holidays. In addition, Section 36.409 states that construction noise levels may not exceed an eight-hour average sound level of 75 A-weighted decibels (dBA) when measured at the boundary line of the property where the noise source is located or on occupied property where the noise is being received. Section 36.410 contains additional noise limits that apply to impulsive construction noise, such as rock crushing, pile driving, or other such activity; however, no impulsive construction is anticipated at the project site.

As stated above, the Project would only generate noise during the construction period. There are no NSLUs onsite or proposed onsite, however, there are NSLUs in the vicinity of the Project. The nearest residences to the north, south, and west are located approximately 40 feet, 60 feet, and 70 feet from the Project boundary, respectively. An analysis of construction noise was performed by Eilar Associates (see Noise Memo) to determine noise levels at residential receiver locations.

Based on calculations conducted for the peak (or worst-case) construction equipment scenario, the Project would not produce noise in excess of the County Noise Ordinance standard of an eight-hour average sound level of 75 dBA at these locations. An analysis of potential noise impacts on habitat occupied by biologically sensitive species, including the least Bell's vireo, is discussed in response IV (a): Biological Resources. The Project

would not generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project that would exceed the standards in the County Noise Ordinance.

b) Generation of excessive groundborne vibration or groundborne noise levels?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less than Significant Impact: The grading stage of the Project's construction phase has the greatest potential to generate the highest vibration levels because of the type of equipment (i.e., bulldozers). According to the Federal Transit Administration Transit Noise and Vibration Assessment Manual (see reference), a small bulldozer generates a peak particle velocity (PPV) of approximately 0.003 inches/second at a distance of 25 feet from equipment. As the nearest residential structure is approximately 40 feet from the boundary of the construction work area, vibration construction vibration impacts.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

No Impact: The Project is located approximately 4.75 miles southeast of the Fallbrook Community Airpark and approximately 7.15 miles northwest of Blackinton Airport, and all work areas would be located outside of the Airport Land Use Compatibility Plans for both airports. In addition, no noise-sensitive residential or commercial receptors (i.e., NSLUs) would be constructed as part of the Project. Therefore, the Project would not expose people residing or working in the Project area to excessive noise levels.

XIV. POPULATION AND HOUSING – Would the project:

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

No Impact: The Project would convert a former golf course to a habitat restoration area. No new homes, businesses, or infrastructure, such as roads or utilities, would be constructed as part of the proposed restoration work. Temporary construction activities would draw employees from the San Diego County area and not induce population growth

from outside the region. The Project would not induce substantial unplanned population growth in an area, either directly or indirectly.

- b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

No Impact: The Project would not displace any existing housing because the project site is a former golf course and currently vacant. No people or housing would be displaced such that construction of replacement housing would be required.

XV. PUBLIC SERVICES

- a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance service ratios, response times or other performance objectives for any of the public services:

- i. Fire protection?
- ii. Police protection?
- iii. Schools?
- iv. Parks?
- v. Other public facilities?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

No Impact: No new residents are proposed by the Project that would increase the demand for public services, including fire protection, police protection, schools, parks, or other public facilities. Therefore, the Project would not result in or accelerate the physical deterioration of any governmental facilities.

XVI. RECREATION

- a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

No Impact: No new residents would be generated by the Project that would increase the use of neighborhood or regional parks or recreation facilities. Therefore, the Project would not result in or accelerate the physical deterioration of recreation facilities.

- b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

No Impact: The Project would re-establish biological resources on-site. No recreation facilities are proposed or required that would have an adverse physical effect on the environment.

XVII. TRANSPORTATION – Would the project:

- a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Less than Significant Impact: The County's Transportation Study Guide provides criteria on how projects should be evaluated for consistency related to the County's transportation goals, policies and plans, and through procedures established under CEQA. The Transportation Study Guide is also a comprehensive manual for both CEQA Vehicle Miles Traveled [described further in XVII. Transportation (b)] and non-CEQA Local Mobility Analysis.

The following discussion is based on the Transportation Analysis prepared by VRPA Technologies, Inc. dated June 26, 2020. The Project would generate little or no trips upon completion of the restoration work. Based on the Transportation Analysis (see Traffic Memo), the Project's peak construction phase wherein demolition and debris removal would take place over a ten-day period, would generate 56 average daily trips (ADT) comprised of both autos and trucks. Approximately 24 ADT would occur in the AM peak hour and 24 trips would occur during the PM peak hour. Construction access would be situated on-site near the northern terminus of Golf Club Drive. The rest of the construction phase would produce less vehicle trips over the 14- to 16-month duration of the Project's construction. Construction is not anticipated to interrupt the normal function of any roadways, however if it is later determined during the course of construction that construction equipment would interrupt normal roadway function, the applicant would conform to County requirements to prepare a traffic control plan and obtain a traffic control permit for temporary traffic control in accordance with County Code of Regulatory Ordinances Section 72.75. The Project would temporarily generate minimal trips during

monitoring/maintenance period and none upon completion of those activities given the open space use. In addition, the Project would not conflict with County policies related to non-motorized travel such as mass transit, pedestrian, or bicycle facilities. Construction trips would be minor in volume compared to existing trips in the Project area and temporary in nature, and the Project would not produce a permanent increase in traffic. Therefore, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system.

b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less than Significant Impact: Section 15064.3 of the CEQA Guidelines details new regulations, effective statewide July 1, 2020, that set forth specific considerations for evaluating a project's transportation impacts. Generally, vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts. VMT refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include effects of a project on transit and non-motorized travel. Except as provided regarding roadway capacity, a project's effect on automobile delay shall not constitute a significant environmental impact.

As noted in response XVII (a): Transportation, the Project is expected to generate a total of 56 trips per day during the peak construction period. Since the Project would produce less than 110 trips per day, it is considered by the County to be a small employment project (during the construction phase only) and would not trigger a VMT analysis. Therefore, the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves, or dangerous intersections) or incompatible uses (e.g., farm equipment)?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

No Impact: The Project is a habitat restoration improvement and would not modify or construct any road improvements that would result in safety hazards related to sharp curves or dangerous intersections. Construction equipment would be delivered to the project site and would operate for a period of 14 to 16 months before removal; thus, the Project would not result in incompatible uses. Therefore, the Project would not result in an impact to transportation safety.

d) Result in inadequate emergency access?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

No Impact: Up to 56 construction vehicles would travel to/from the Project site during the peak construction period. Implementation of the Project would not result in inadequate emergency access because of the minor amount of construction traffic that would be produced and placement/parking of construction vehicles on the Project site, rather than on the adjacent roads.

XVIII. TRIBAL CULTURAL RESOURCES – Would the project:

a) Cause a substantial adverse change in the significance of a tribal cultural resource, as defined in Public Resources Code §21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i Listed or eligible for listing in the California Register of Historical Resources, or in a local register of Historical Resources as defined in Public Resources Code §5020.1(k), or

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

ii A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code §5024.1, the Lead Agency shall consider the significance of the resource to a California Native American tribe.

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact with Mitigation Incorporated:

Pursuant to AB-52, consultation was initiated with culturally affiliated tribes (Pala, Pechanga, Rincon, San Luis Rey, Soboba) on February 23, 2021. Two tribes (Pechanga, Rincon) requested consultation. County staff has met with both tribes who have identified the area as culturally sensitive. Because of the sensitivity of the area, there is the potential for unknown TCRs to be present. As such, the project is conditioned with mitigation measures CULT#1, CULT#2, CULT#GR-1, CULT#GR-2, CULT#GR-3, CULT#GR-4 to

reduce impacts to cultural resources and TCRs to less than significant. During consultation, mitigation measures (CULT#1, CULT#2, CULT#GR-1, CULT#GR-2, CULT#GR-3, CULT#GR-4) were revised at the request of the tribes. Rincon concurred with the revisions and concluded consultation on May 11, 2021. Pechanga has also concurred with the revisions and consultation was concluded on May 25, 2021.

XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:

- a) Require or result in the relocation of construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which would cause significant environmental effects?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

No Impact: The Project is a habitat restoration improvement for the purposes of re-establishing biological resources on-site. No new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities are required that would cause significant environmental effects.

- b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

No Impact: The Project is a habitat restoration improvement for the purposes of re-establishing biological resources on-site. Municipal water may be used by water trucks for dust control during the construction phase. Municipal water is currently supplied to the Project site and can be used during the maintenance/monitoring phase of the Project if water is required during the initial vegetation establishment period which typically lasts about three years after planting. The Project would have no effects on local water supplies during normal, dry, and multiple dry years.

- c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

No Impact: The Project is a habitat restoration improvement for the purposes of re-establishing biological resources on-site. No wastewater treatment needs would be created by the Project to implement the restoration work. Temporary construction needs would be satisfied by using portable facilities. The Project would have no effects on project demand for wastewater treatment services.

- d) Generate solid waste in excess of state or Local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Less than Significant Impact: A minor amount of demolition waste would be produced to remove the former golf course infrastructure and prepare the project site for construction. Should construction and demolition waste need to be disposed of in local landfills, there are five permitted active landfills in San Diego County with remaining capacity. Therefore, there is sufficient existing permitted solid waste capacity to accommodate the Project's solid waste disposal needs during construction.

- e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Less than Significant Impact: The Project would comply with the County's Construction and Demolition (C&D) Debris Recycling Ordinance which requires diversion of recyclable waste materials produced during construction activities. Specifically, the C&D Ordinance requires construction and demolition projects to recycle, reuse, or donate 65% of all materials, including 90% of inerts (concrete, asphalt, dirt, etc.), and grading projects must recycle or reuse 100% of excavated soils, trees, stumps, rocks, and vegetation. Inert material may be used in upland fill areas. No operational waste would be created by the Project as it is a habitat restoration improvement with no occupants or businesses. Therefore, the Project would comply with the applicable statutes and regulations related to solid waste management.

XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

- a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

No Impact: The Project is a restoration activity that would not result in land use changes that would affect an emergency response or emergency evacuation plan. The Project would not require installation of infrastructure that would exacerbate fire risk.

The purpose of the Project is to improve hydrologic and habitat functions of Moosa Creek and surrounding associated habitat by establishing riparian and upland habitat, improving water quality and recovery of sediment deposition.

Post construction, the increase in riparian vegetation and native plants would likely decrease the risk of wildfire because the restored habitat would include predominately perennial species rather than non-native annual grasses and ruderal weeds that currently dominate the project site, which are generally drier and constitute a higher fire risk.

The Project would not impair an adopted emergency response plan or emergency evacuation plan (see response IX (e): Hazards and Hazardous Materials). The Operational Area Emergency Plan is a comprehensive emergency plan that defines responsibilities, establishes an emergency organization, defines lines of communications, and is designed to be part of the statewide Standardized Emergency Management System. The Operational Area Emergency Plan provides guidance for emergency planning and requires subsequent plans to be established by each jurisdiction that has responsibilities in a disaster situation (Unified San Diego County Emergency Services Organization and County of San Diego, 2018). The Multi-Jurisdictional Hazard Mitigation Plan includes an overview of the risk assessment process, identifies hazards present in the jurisdiction, hazard profiles, and vulnerability assessments. The plan also identifies goals, objectives, and actions for each jurisdiction in the County, including all cities and the County unincorporated areas (County of San Diego OES and San Diego County UDC, 2017). The Project would not interfere with this plan because it would not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out. Project construction and eventual operation (restored habitat) would not require rerouting of traffic or road closures that would impair emergency response services. Therefore, construction activities and post-construction restored habitat would not significantly impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

No Impact: The restoration activities would not result in exacerbated wildfire risk that would expose occupants to pollutant concentrations. When completed, the Project would be unmanned and would not introduce people, structures, or facilities to the project site. Furthermore, the Project would not result in increased slopes or other conditions which would exacerbate wildfire risk.

- c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

No Impact: Implementation of the Project would not require the installation or maintenance of additional infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that would exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.

- d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire instability, or drainage changes?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

No Impact: The Project would be unmanned and would not include any facilities or structures (see Section VII. (a) for details regarding landslide potential). Therefore, the Project would have no impact related to exposing people or structures to flooding, landslides, or risks associated with post-fire instability.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE:

- a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Less than Significant Impact with Mitigation Incorporated: Project impacts to Biological Resources and Cultural Resources are discussed above in the Initial Study. With respect to plant and wildlife species, the Project's ultimate impact would be beneficial in nature because of the restoration of native habitats in an area that has been historically disturbed by a golf course for several decades. Any temporary impacts on wildlife species during the construction phase would not cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. Construction would

be implemented in a manner consistent with conservation policies of the County's MSCP. With regard to cultural resources, the project would not have an impact on known historical or archaeological resources related to major periods of California history or prehistory. In the unlikely event that unknown resources are encountered during the Project's construction phases, the Project would implement mitigation which would require a qualified archaeologist to provide monitoring support during grading activities with a reasonable likelihood to disturb areas of archaeological sensitivity. In the unlikely case of an incidental discovery of human remains during construction, the County Coroner and qualified archaeologist would be immediately notified. No further ground disturbance would occur in the area until the County Coroner makes necessary findings regarding origin. If the remains are determined to be of Native American origin, the most likely descendant, as identified by the NAHC, would be contacted to determine the proper treatment of the remains.

- b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

- ☐ Potentially Significant Impact ☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

The following list of past, present and future projects were considered and evaluated as a part of this Initial Study:

PROJECT NAME	PERMIT TYPE	LOCATION	STATUS
San Luis Rey Training Center (SLRTC)	Grading Permit	6236 Camino Del Rey	Approved 4/2020
Fairview Resource Management Plan	Site Plan Modification, Landscape Plan, Resource Management Plan	5564 Camino Del Cielo	Approved 6/2020
Ocean Breeze Ranch	Tentative Map and Major Use Permit.	5820 West Lilac Road	Approved 12/2019

Less than Significant: A review of the County Planning & Development Services current projects website identified three projects in the Project area as listed in the table above. None of these projects would likely interfere with or overlap with the Project's construction activities which would not begin until early 2021, depending on the ability to avoid the nesting bird breeding season. In addition, the Project's impacts are localized to the immediate Project area given their temporary nature as construction phase effects. Long-term operational impacts are determined to be negligible.

Per the instructions for evaluating environmental impacts in this Initial Study, the potential for adverse cumulative effects were considered in the response to each question in sections I through XVIII of this form. In addition to Project-specific impacts, this evaluation considered the Project's potential for incremental effects that are cumulatively considerable. As a result of this evaluation, there is no substantial evidence that there are cumulative effects associated with this Project. Therefore, the Project has been determined not to meet this Mandatory Finding of Significance.

c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less than Significant Impact: The Project's potential to result in impacts to human health have been addressed above in Section III. Air Quality, Section IX. Hazards and Hazardous Materials, and Section XIII. Noise. As discussed in those sections, the Project would not have environmental effects that would cause substantial direct or indirect adverse effects on human beings. Compliance with regulations combined with the lack of new residents on the Project site would result in less than significant impacts to human beings.

XXII. REFERENCES USED IN THE COMPLETION OF THE INITIAL STUDY CHECKLIST

TECHNICAL STUDIES: The following is a list of project specific technical studies used to support the analysis of each potential environmental effect:

Blackhawk Environmental. September 2020. Updated Vegetation Communities of the Proposed Moosa Creek Riparian Restoration Project, Bonsall, San Diego County, California.

Blackhawk Environmental. September 2020. Focused Rare Plant Survey Report Moosa Creek Riparian Restoration Project. Bonsall, San Diego County, California.

Blackhawk Environmental. July 2020. Least Bell's Vireo & Southwestern Willow Flycatcher Survey Results, Moosa Creek Riparian Restoration Project. Bonsall, San Diego County, California.

Blackhawk Environmental. September 2020. Update to Delineation of Potentially Jurisdictional Wetland and Non-wetland Waters for the Proposed Moosa Creek Riparian Restoration Project. Bonsall, San Diego County, California.

Eilar Associates, Inc. September 2020. Moosa Creek Riparian Restoration Project – Noise Analysis.

VRPA Technologies. June 26, 2020. Moosa Creek Riparian Restoration Project, Transportation Analysis.

Advantage Environmental Consultants, LLC. August 2017. Phase I Environmental Site Assessment, Proposed Moosa Creek Mitigation Bank. updated July 2020.

AESTHETICS

Caltrans. 2016. "San Diego County State Scenic Highways." 2016.
(http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways). Accessed: February 6, 2018.

County of San Diego. General Plan. Bonsall Community Plan. August 3 2011.

County of San Diego. County of San Diego Light Pollution Code. 2020
(<https://www.sandiegocounty.gov/pds/docs/LightPollutionCode.pdf>). Accessed: June 22.

AGRICULTURE RESOURCES

California Department of Conservation (CDC). Farmland Mapping and Monitoring Program (FMMP). 2020.
(<https://www.conservation.ca.gov/dlrp/fmmp>). Accessed: June 22.

County of San Diego Planning & Development Services. Preliminary Review of Resources for IS/EA Preparation. 2020.

AIR QUALITY

APCD. 2016 Revision of the Regional Air Quality Strategy (RAQS) for San Diego County. December 2016.

BIOLOGICAL RESOURCES

WRA, Inc. Bank Enabling Instrument. Moosa Creek Mitigation Bank Property. San Luis Rey River Watershed – San Diego County, California. 2015.

CULTURAL RESOURCES

Brian F. Smith & Associates, "A Class III Cultural Resources Study for the Moosa Creek Mitigation Bank Project," March 5, 2013.

ENERGY USE

County of San Diego. Final County of San Diego Climate Action Plan. 2018.

GEOLOGY & SOILS

California Department of Conservation, Division of Mines and Geology. California Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997.
(www.consrv.ca.gov)

California Department of Conservation, Division of Mines and Geology, Fault-Rupture Hazard Zones in California, Special Publication 42, revised 1997. (www.consrv.ca.gov)

California Department of Conservation, Division of Mines and Geology, Special Publication 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California, 1997.
(www.consrv.ca.gov)

County of San Diego, Guidelines for Determining Significance, Paleontological Resources, Modified January 15, 2009.

County of San Diego Natural Resource Inventory, Section 3, Geology.

United States Department of Agriculture, Soil Survey for the San Diego Area, California. 1973.
(soils.usda.gov)

WRA Environmental Consultants. Development Plan Moosa Creek Mitigation Bank. San Luis Rey Watershed – San Diego County, California, 2015.

GREENHOUSE GAS EMISSIONS

CAPCAO, 2008. CEQA & Climate Change Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act. January.

Environmental Protection Agency. 2008. Carbon Sequestration in Agriculture and Forestry.
www.epa.gov/sequestration/index.html.

SCAQMD, 2008. Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold. October.

HAZARDS & HAZARDOUS MATERIALS

California Stormwater Quality Association (CASQA). Stormwater BMP Handbook. 2019.

San Diego County. BMP Design Manual. 2019

California Department of Forestry and Fire Protection – Fire and Resource Assessment Program (CAL FIRE), "California Fire Hazard Zone Viewer," January 2020. (gis.data.ca.gov)

California Department of Water Resources, Division of Safety of Dams, "Inundation Maps."
(<https://fmds.water.ca.gov/>)

California Environmental Protection Agency
(CalEPA), "Cortese List Data Resources."
(<https://calepa.ca.gov/sitecleanup/corteselist/>)

California Government Code. § 8585-8589,
Emergency Services Act.
(<http://leginfo.legislature.ca.gov/>)

California Health & Safety Code Chapter 6.95 and
§25117 and §25316.
(<http://leginfo.legislature.ca.gov/>)

California Health & Safety Code § 2000-2067.
(<http://leginfo.legislature.ca.gov/>)

California Public Utilities Code, SAN DIEGO
COUNTY REGIONAL AIRPORT AUTHORITY.
Public Utilities Code, Division 17, Sections
170000-170084.
(<http://leginfo.legislature.ca.gov/>)

County of San Diego, Department of Environmental
Health, Hazardous Materials Division. California
Accidental Release Prevention Program
(CalARP) Guidelines.
(<http://www.sdcounty.ca.gov/>, caloes.ca.gov)

County of San Diego, Department of Environmental
Health, Hazardous Materials Division.
Hazardous Materials Business Plan Guidelines.
(www.sdcounty.ca.gov)

County of San Diego Office of Emergency Services
(OES) and San Diego County Unified Disaster
Council (UDC), Multi-Jurisdictional Hazard
Mitigation Plan, San Diego County, California,
October 2017.

State Water Resources Control Board, "GeoTracker
Website."
(<https://geotracker.waterboards.ca.gov/>)

Unified San Diego County Emergency Services
Organization and County of San Diego,
Operational Area Emergency Operations Plan,
September 2018.

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California Department of Water Resources, Division
of Safety of Dams, "Inundation Maps."
(<https://fmds.water.ca.gov/>)

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County of San Diego. General Plan. Bonsall
Community Plan. August 3, 2011.

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California Department of Conservation, Division of
Mines and Geology, Update of Mineral Land
Classification: Aggregate Materials in the
Western San Diego Production-Consumption
Region, 1996.

National Environmental Policy Act, Title 42, 36.401 et.
seq. 1969. (www4.law.cornell.edu)

Subdivision Map Act, 2011.
(leginfo.legislature.ca.gov)

U.S. Geologic Survey, Causey, J. Douglas.
MAS/MILS Mineral Location Database. 1998.

U.S. Geologic Survey, Frank, David G. (MRDS)
Mineral Resource Data System. 1998.

NOISE

County of San Diego Code of Regulatory Ordinances,
Title 3, Division 6, Chapter 4, Noise Abatement
and Control, effective February 4,
1982. (<https://www.sandiegocounty.gov/dplu/docs/NO.pdf>) Accessed June 18, 2020.

San Diego County Water Authority. Subregional
Natural Community Conservation Plan/Habitat
Conservation Plan. October
2010 (<http://www.sdcwa.org/natural-community-conservation-plan-habitat-conservation-plan>)
Accessed June 18, 2020.

Department for Environment Food and Rural Affairs
(DEFRA). Update of Noise Database for
Prediction of Noise on Construction and Open
Sites. 2005.

Federal Highway Administration (FHWA).
Construction Noise Handbook. August 2006.

San Diego County Regional Airport Authority
(SDCRAA). Fallbrook Community Airpark Land
Use Compatibility Plan. 2011.
(https://www.san.org/DesktopModules/Bring2mind/DMX/API/Entries/Download?Comm and=Core_Download&EntryId=2945&language=en-US&PortalId=0&TabId=225)
Accessed June 18, 2020.

Federal Transit Administration (FTA). Transit Noise
and Vibration Impact Assessment. 2018.

California Department of Transportation (Caltrans).
Transportation and Construction Vibration
Guidance Manual. September 2013

(<https://www.documents.dgs.ca.gov/bsc/CALGreen/CALGreen-Guide-2016-FINAL.pdf>)
Accessed: March 2018.

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County of San Diego. Construction and Demolition
(C&D) Debris Recycling Ordinance. 2020.
(<https://www.sandiegocounty.gov/content/sdc/dpw/recycling/newcdhome.html>) Accessed June
29.

County of San Diego OES and San Diego County
UDC. Multi-Jurisdictional Hazard Mitigation Plan,
San Diego County, California. October 2017.

Unified San Diego County Emergency Services
Organization and County Of San Diego.
Operational Area Emergency Operations Plan.
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California Building Standards Commission (CBSC).
2017. Guide to the 2016 California Green
Building Standard Code. 2017.

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Plan. 2017.